

MICROCOPY

892

ROLL

94

NATIONAL ARCHIVES MICROFILM PUBLICATIONS

Microfilm Publication M892

RECORDS OF THE UNITED STATES

NUERNBERG WAR CRIMES TRIALS

UNITED STATES OF AMERICA v. CARL KRAUCH ET AL. (CASE VI)

AUGUST 14, 1947-JULY 30, 1948

Roll 94

Defense Document Books

von Schnitzler(part), 9-Loose Copies

Wurster, 1-Disposition of the Document Books



THE NATIONAL ARCHIVES
NATIONAL ARCHIVES AND RECORDS SERVICE
GENERAL SERVICES ADMINISTRATION

WASHINGTON: 1976

INTRODUCTION

On the 113 rolls of this microfilm publication are reproduced the records of Case VI, *United States of America v. Carl Krauch et al.* (I. G. Farben Case), 1 of the 12 trials of war criminals conducted by the U.S. Government from 1946 to 1949 at Nuernberg subsequent to the International Military Tribunal (IMT) held in the same city. These records consist of German- and English-language versions of official transcripts of court proceedings, prosecution and defense briefs and statements, and defendants' final pleas as well as prosecution and defense exhibits and document books in one language or the other. Also included are minute books, the official court file, order and judgment books, clemency petitions, and finding aids to the documents.

The transcripts of this trial, assembled in 2 sets of 43 bound volumes (1 set in German and 1 in English), are the recorded daily trial proceedings. Prosecution statements and briefs are also in both languages but unbound, as are the final pleas of the defendants delivered by counsel or defendants and submitted by the attorneys to the court. Unbound prosecution exhibits, numbered 1-2270 and 2300-2354, are essentially those documents from various Nuernberg record series, particularly the NI (Nuernberg Industrialist) Series, and other sources offered in evidence by the prosecution in this case. Defense exhibits, also unbound, are predominantly affidavits by various persons. They are arranged by name of defendant and thereunder numerically, along with two groups of exhibits submitted in the general interest of all defendants. Both prosecution and defense document books consist of full or partial translations of exhibits into English. Loosely bound in folders, they provide an indication of the order in which the exhibits were presented before the tribunal.

Minute books, in two bound volumes, summarize the transcripts. The official court file, in nine bound volumes, includes the progress docket, the indictment, and amended indictment and the service thereof; applications for and appointments of defense counsel and defense witnesses and prosecution comments thereto; defendants' application for documents; motions and reports; uniform rules of procedures; and appendixes. The order and judgment books, in two bound volumes, represent the signed orders, judgments, and opinions of the tribunal as well as sentences and commitment papers. Defendants' clemency petitions, in three bound volumes, were directed to the military governor, the Judge Advocate General, and the U.S. District Court for the District of Columbia. The finding aids summarize transcripts, exhibits, and the official court file.

Case VI was heard by U.S. Military Tribunal VI from August 14, 1947, to July 30, 1948. Along with records of other Nuernberg

NATIONAL ARCHIVES MICROFILM PUBLICATIONS

and Far East war crimes trials, the records of this case are part of the National Archives Collection of World War II War Crimes Records, Record Group 238.

The I. G. Farben Case was 1 of 12 separate proceedings held before several U.S. Military Tribunals at Nuernberg in the U.S. Zone of Occupation in Germany against officials or citizens of the Third Reich, as follows:

<u>Case No.</u>	<u>United States v.</u>	<u>Popular Name</u>	<u>No. of Defendants</u>
1	<i>Karl Brandt et al.</i>	Medical Case	23
2	<i>Erhard Milch</i>	Milch Case (Luftwaffe)	1
3	<i>Josef Altstoetter et al.</i>	Justice Case	16
4	<i>Oswald Pohl et al.</i>	Pohl Case (SS)	18
5	<i>Friedrich Flick et al.</i>	Flick Case (Industrialist)	6
6	<i>Carl Krauch et al.</i>	I. G. Farben Case (Industrialist)	24
7	<i>Wilhelm List et al.</i>	Hostage Case	12
8	<i>Ulrich Greifelt et al.</i>	RuSHA Case (SS)	14
9	<i>Otto Ohlendorf et al.</i>	Einsatzgruppen Case (SS)	24
10	<i>Alfried Krupp et al.</i>	Krupp Case (Industrialist)	12
11	<i>Ernst von Weissacker et al.</i>	Ministries Case	21
12	<i>Wilhelm von Leeb et al.</i>	High Command Case	14

Authority for the proceedings of the IMT against the major Nazi war criminals derived from the Declaration on German Atrocities (Moscow Declaration) released November 1, 1943; Executive Order 9547 of May 2, 1945; the London Agreement of August 8, 1945; the Berlin Protocol of October 6, 1945; and the IMT Charter.

Authority for the 12 subsequent cases stemmed mainly from Control Council Law 10 of December 20, 1945, and was reinforced by Executive Order 9679 of January 16, 1946; U.S. Military Government Ordinances 7 and 11 of October 18, 1946, and February 17, 1947, respectively; and U.S. Forces, European Theater General Order 301 of October 24, 1946. Procedures applied by U.S. Military Tribunals in the subsequent proceedings were patterned after those of the IMT and further developed in the 12 cases, which required over 1,200 days of court sessions and generated more than 330,000 transcript pages.

Formation of the I. G. Farben Combine was a stage in the evolution of the German chemical industry, which for many years led the world in the development, production, and marketing of organic dyestuffs, pharmaceuticals, and synthetic chemicals. To control the excesses of competition, six of the largest chemical firms, including the Badische Anilin & Soda Fabrik, combined to form the Interessengemeinschaft (Combine of Interests, or Trust) of the German Dyestuffs Industry in 1904 and agreed to pool technological and financial resources and markets. The two remaining chemical firms of note entered the combine in 1916. In 1925 the Badische Anilin & Soda Fabrik, largest of the firms and already the majority shareholder in two of the other seven companies, led in reorganizing the industry to meet the changed circumstances of competition in the post-World War markets by changing its name to the I. G. Farbenindustrie Aktiengesellschaft, moving its home office from Ludwigshafen to Frankfurt, and merging with the remaining five firms.

Farben maintained its influence over both the domestic and foreign markets for chemical products. In the first instance the German explosives industry, dependent on Farben for synthetically produced nitrates, soon became subsidiaries of Farben. Of particular interest to the prosecution in this case were the various agreements Farben made with American companies for the exchange of information and patents and the licensing of chemical discoveries for foreign production. Among the trading companies organized to facilitate these agreements was the General Anilin and Film Corp., which specialized in photographic processes. The prosecution charged that Farben used these connections to retard the "Arsenal of Democracy" by passing on information received to the German Government and providing nothing in return, contrary to the spirit and letter of the agreements.

Farben was governed by an Aufsichtsrat (Supervisory Board of Directors) and a Vorstand (Managing Board of Directors). The Aufsichtsrat, responsible for the general direction of the firm, was chaired by defendant Krauch from 1940. The Vorstand actually controlled the day-to-day business and operations of Farben. Defendant Schmitz became chairman of the Vorstand in 1935, and 18 of the other 22 original defendants were members of the Vorstand and its component committees.

Transcripts of the I. G. Farben Case include the indictment of the following 24 persons:

Otto Ambros: Member of the Vorstand of Farben; Chief of Chemical Warfare Committee of the Ministry of Armaments and War Production; production chief for Buna and poison gas; manager of Auschwitz, Schkopau, Ludwigshafen, Oppau, Gendorf, Dyhernfurth, and Falkenhagen plants; and Wehrwirtschaftsfuehrer.

Max Brueggemann: Member and Secretary of the Vorstand of Farben; member of the legal committee; Deputy Plant Leader of the Leverkusen Plant; Deputy Chief of the Sales Combine for Pharmaceuticals; and director of the legal, patent, and personnel departments of the Works Combine, Lower Rhine.

Ernst Buergin: Member of the Vorstand of Farben; Chief of Works Combine, Central Germany; Plant Leader at the Bitterfeld and Wolfen-Farben plants; and production chief for light metals, dyestuffs, organic intermediates, plastics, and nitrogen at these plants.

Heinrich Buetefisch: Member of the Vorstand of Farben; manager of Leuna plants; production chief for gasoline, methanol, and chlorine electrolysis production at Auschwitz and Moosbierbaum; Wehrwirtschaftsfuehrer; member of the Himmler Freundeskreis (circle of friends of Himmler); and SS Obersturmbannfuehrer (Lieutenant Colonel).

Walter Duerrfeld: Director and construction manager of the Auschwitz plant of Farben, director and construction manager of the Monowitz Concentration Camp, and Chief Engineer at the Leuna plant.

Fritz Gajewski: Member of the Central Committee of the Vorstand of Farben, Chief of Sparte III (Division III) in charge of production of photographic materials and artificial fibers, manager of "Agfa" plants, and Wehrwirtschaftsfuehrer.

Heinrich Gattineau: Chief of the Political-Economic Policy Department, "WIPO," of Farben's Berlin N.W. 7 office; member of Southeast Europe Committee; and director of A.G. Dynamit Nobel, Pressburg, Czechoslovakia.

Paul Haefliger: Member of the Vorstand of Farben; member of the Commercial Committee; and Chief, Metals Departments, Sales Combine for Chemicals.

Erich von der Heyde: Member of the Political-Economic Policy Department of Farben's Berlin N.W. 7 office, Deputy to the Chief of Intelligence Agents, SS Hauptsturmfuehrer, and member of the WI-RUE-AMT (Military Economics and Armaments Office) of the Oberkommando der Wehrmacht (OKW) (High Command of the Armed Forces).

Heinrich Hoerlein: Member of the Central Committee of the Vorstand of Farben; chief of chemical research and development of vaccines, sera, pharmaceuticals, and poison gas; and manager of the Elberfeld Plant.

Max Ilgner: Member of the Vorstand of Farben; Chief of Farben's Berlin N.W. 7 office directing intelligence, espionage, and propaganda activities; member of the Commercial Committee; and Wehrwirtschaftsfuehrer.

Friedrich Jaehne: Member of the Vorstand of Farben; chief engineer in charge of construction and physical plant development; Chairman of the Engineering Committee; and Deputy Chief, Works Combine, Main Valley.

August von Knieriem: Member of the Central Committee of the Vorstand of Farben; Chief Counsel of Farben; and Chairman, Legal and Patent Committees.

Carl Krauch: Chairman of the Aufsichtsrat of Farben and Generalbevollmaechtigter fuer Sonderfragen der Chemischen Erzeugung (General Plenipotentiary for Special Questions of Chemical Production) on Goering's staff in the Office of the 4-Year Plan.

Hans Kuehne: Member of the Vorstand of Farben; Chief of the Works Combine, Lower Rhine; Plant Leader at Leverkusen, Elberfeld, Uerdingen, and Dormagen plants; production chief for inorganics, organic intermediates, dyestuffs, and pharmaceuticals at these plants; and Chief of the Inorganics Committee.

Hans Kugler: Member of the Commercial Committee of Farben; Chief of the Sales Department Dyestuffs for Hungary, Rumania, Yugoslavia, Greece, Bulgaria, Turkey, Czechoslovakia, and Austria; and Public Commissar for the Falkenau and Aussig plants in Czechoslovakia.

Carl Lautenschlaeger: Member of the Vorstand of Farben; Chief of Works Combine, Main Valley; Plant Leader at the Hoechst, Griesheim, Mainkur, Gersthofen, Offenbach, Eystrup, Marburg, and Neuhausen plants; and production chief for nitrogen, inorganics, organic intermediates, solvents and plastics, dyestuffs, and pharmaceuticals at these plants.

Wilhelm Mann: Member of the Vorstand of Farben, member of the Commercial Committee, Chief of the Sales Combine for Pharmaceuticals, and member of the SA.

Fritz ter Meer: Member of the Central Committee of the Vorstand of Farben; Chief of the Technical Committee of the Vorstand that planned and directed all of Farben's production; Chief of Sparte II in charge of production of Buna, poison gas, dyestuffs, chemicals, metals, and pharmaceuticals; and Wehrwirtschaftsfuehrer.

Heinrich Oster: Member of the Vorstand of Farben, member of the Commercial Committee, and manager of the Nitrogen Syndicate.

Hermann Schmitz: Chairman of the Vorstand of Farben, member of the Reichstag, and Director of the Bank of International Settlements.

Christian Schneider: Member of the Central Committee of the Vorstand of Farben; Chief of Sparte I in charge of production of nitrogen, gasoline, diesel and lubricating oils, methanol, and organic chemicals; Chief of Central Personnel Department, directing the treatment of labor at Farben plants; Wehrwirtschaftsfuehrer; Hauptabwehrbeauftragter (Chief of Intelligence Agents); Hauptbetriebsfuehrer (Chief of Plant Leaders); and supporting member of the Schutzstaffeln (SS) of the NSDAP.

Georg von Schnitzler: Member of the Central Committee of the Vorstand of Farben, Chief of the Commercial Committee of the Vorstand that planned and directed Farben's domestic and foreign sales and commercial activities, Wehrwirtschaftsfuehrer (Military Economy Leader), and Hauptsturmfaehrer (Captain) in the Sturmabteilungen (SA) of the Nazi Party (NSDAP).

Carl Wurster: Member of the Vorstand of Farben; Chief of the Works Combine, Upper Rhine; Plant Leader at Ludwigshafen and Oppau plants; production chief for inorganic chemicals; and Wehrwirtschaftsfuehrer.

The prosecution charged these 24 individual staff members of the firm with various crimes, including the planning of aggressive war through an alliance with the Nazi Party and synchronization of Farben's activities with the military planning of the German High Command by participation in the preparation of the 4-Year Plan, directing German economic mobilization for war, and aiding in equipping the Nazi military machines.¹ The defendants also were charged with carrying out espionage and intelligence activities in foreign countries and profiting from these activities. They participated in plunder and spoliation of Austria, Czechoslovakia, Poland, Norway, France, and the Soviet Union as part of a systematic economic exploitation of these countries. The prosecution also charged mass murder and the enslavement of many thousands of persons particularly in Farben plants at the Auschwitz and Monowitz concentration camps and the use of poison gas manufactured by the firm in the extermination

¹ The trial of defendant Brueggemann was discontinued early during the proceedings because he was unable to stand trial on account of ill health.

of millions of men, women, and children. Medical experiments were conducted by Farben on enslaved persons without their consent to test the effects of deadly gases, vaccines, and related products. The defendants were charged, furthermore, with a common plan and conspiracy to commit crimes against the peace, war crimes, and crimes against humanity. Three defendants were accused of membership in a criminal organization, the SS. All of these charges were set forth in an indictment consisting of five counts.

The defense objected to the charges by claiming that regulations were so stringent and far reaching in Nazi Germany that private individuals had to cooperate or face punishment, including death. The defense claimed further that many of the individual documents produced by the prosecution were originally intended as "window dressing" or "howling with the wolves" in order to avoid such punishment.

The tribunal agreed with the defense in its judgment that none of the defendants were guilty of Count I, planning, preparation, initiation, and waging wars of aggression; or Count V, common plans and conspiracy to commit crimes against the peace and humanity and war crimes.

The tribunal also dismissed particulars of Count II concerning plunder and exploitation against Austria and Czechoslovakia. Eight defendants (Schmitz, von Schnitzler, ter Meer, Buergin, Haeffliger, Ilgner, Oster, and Kugler) were found guilty on the remainder of Count II, while 15 were acquitted. On Count III (slavery and mass murder), Ambros, Bueteffisch, Duerrfeld, Krauch, and ter Meer were judged guilty. Schneider, Bueteffisch, and von der Heyde also were charged with Count IV, membership in a criminal organization, but were acquitted.

The tribunal acquitted Gajewski, Gattineau, von der Heyde, Hoerlein, von Knieriem, Kuehne, Lautenschlaeger, Mann, Schneider, and Wurster. The remaining 13 defendants were given prison terms as follows:

<u>Name</u>	<u>Length of Prison Term (years)</u>
Ambros	8
Buergin	2
Bueteffisch	6
Duerrfeld	8
Haeffliger	2
Ilgner	3
Jaehne	1 1/2
Krauch	6
Kugler	1 1/2
Oster	2
Schmitz	4
von Schnitzler	5
ter Meer	7

All defendants were credited with time already spent in custody.

In addition to the indictments, judgments, and sentences, the transcripts also contain the arraignment and plea of each defendant (all pleaded not guilty) and opening statements of both defense and prosecution.

The English-language transcript volumes are arranged numerically, 1-43, and the pagination is continuous, 1-15834 (page 4710 is followed by pages 4710(1)-4710(285)). The German-language transcript volumes are numbered 1a-43a and paginated 1-16224 (14a and 15a are in one volume). The letters at the top of each page indicate morning, afternoon, or evening sessions. The letter "C" designates commission hearings (to save court time and to avoid assembling hundreds of witnesses at Nuernberg, in most of the cases one or more commissions took testimony and received documentary evidence for consideration by the tribunals). Two commission hearings are included in the transcripts: that for February 7, 1948, is on pages 6957-6979 of volume 20 in the English-language transcript, while that for May 7, 1948, is on pages 14775a-14776 of volume 40a in the German-language transcript. In addition, the prosecution made one motion of its own and, with the defense, six joint motions to correct the English-language transcripts. Lists of the types of errors, their location, and the prescribed corrections are in several volumes of the transcripts as follows:

- First Motion of the Prosecution, volume 1
- First Joint Motion, volume 3
- Second Joint Motion, volume 14
- Third Joint Motion, volume 24
- Fourth Joint Motion, volume 29
- Fifth Joint Motion, volume 34
- Sixth Joint Motion, volume 40

The prosecution offered 2,325 prosecution exhibits numbered 1-2270 and 2300-2354. Missing numbers were not assigned due to the difficulties of introducing exhibits before the commission and the tribunal simultaneously. Exhibits 1835-1838 were loaned to an agency of the Department of Justice for use in a separate matter, and apparently No. 1835 was never returned. Exhibits drew on a variety of sources, such as reports and directives as well as affidavits and interrogations of various individuals. Maps and photographs depicting events and places mentioned in the exhibits are among the prosecution resources, as are publications, correspondence, and many other types of records.

The first item in the arrangement of prosecution exhibits is usually a certificate giving the document number, a short description of the exhibits, and a statement on the location of the original document or copy of the exhibit. The certificate is followed by the actual prosecution exhibit (most are photostats,

NATIONAL ARCHIVES MICROFILM PUBLICATIONS

but a few are mimeographed articles with an occasional carbon of the original). The few original documents are often affidavits of witnesses or defendants, but also ledgers and correspondence, such as:

<u>Exhibit No.</u>	<u>Doc. No.</u>	<u>Exhibit No.</u>	<u>Doc. No.</u>
322	NI 5140	1558	NI 11411
918	NI 6647	1691	NI 12511
1294	NI 14434	1833	NI 12789
1422	NI 11086	1886	NI 14228
1480	NI 11092	2313	NI 13566
1811	NI 11144		

In rare cases an exhibit is followed by a translation; in others there is no certificate. Several of the exhibits are of poor legibility and a few pages are illegible.

Other than affidavits, the defense exhibits consist of newspaper clippings, reports, personnel records, Reichgesetzblatt excerpts, photographs, and other items. The 4,257 exhibits for the 23 defendants are arranged by name of defendant and thereunder by exhibit number. Individual exhibits are preceded by a certificate wherever available. Two sets of exhibits for all the defendants are included.

Translations in each of the prosecution document books are preceded by an index listing document numbers, biased descriptions, and page numbers of each translation. These indexes often indicate the order in which the prosecution exhibits were presented in court. Defense document books are similarly arranged. Each book is preceded by an index giving document number, description, and page number for every exhibit. Corresponding exhibit numbers generally are not provided. There are several unindexed supplements to numbered document books. Defense statements, briefs, pleas, and prosecution briefs are arranged alphabetically by defendant's surname. Pagination is consecutive, yet there are many pages where an "a" or "b" is added to the numeral.

At the beginning of roll 1 key documents are filmed from which Tribunal VI derived its jurisdiction: the Moscow Declaration, U.S. Executive Orders 9547 and 9679, the London Agreement, the Berlin Protocol, the IMT Charter, Control Council Law 10, U.S. Military Government Ordinances 7 and 11, and U.S. Forces, European Theater General Order 301. Following these documents of authorization is a list of the names and functions of members of the tribunal and counsels. These are followed by the transcript covers giving such information as name and number of case, volume numbers, language, page numbers, and inclusive dates. They are followed by the minute book, consisting of summaries of the daily proceedings, thus providing an additional finding aid for the transcripts. Exhibits are listed in an index that notes the

type, number, and name of exhibit; corresponding document book, number, and page; a short description of the exhibit; and the date when it was offered in court. The official court file is summarized by the progress docket, which is preceded by a list of witnesses.

Not filmed were records duplicated elsewhere in this microfilm publication, such as prosecution and defense document books in the German language that are largely duplications of the English-language document books.

The records of the I. G. Farben Case are closely related to other microfilmed records in Record Group 238, specifically prosecution exhibits submitted to the IMT, T988; NI (Nuernberg Industrialist) Series, T301; NM (Nuernberg Miscellaneous) Series, M-936; NOKW (Nuernberg Armed Forces High Command) Series, T1119; NG (Nuernberg Government) Series, T1139; NP (Nuernberg Propaganda) Series, M942; WA (undetermined) Series, M946; and records of the Brandt case, M887; the Milch Case, M888; the Altstoetter case, M889; the Pohl Case, M890; the Flick Case, M891; the List case, M893; the Greifelt case, M894; and the Ohlendorf case, M895. In addition, the record of the IMT at Nuernberg has been published in the 42-volume *Trial of the Major War Criminals Before the International Military Tribunal* (Nuernberg, 1947). Excerpts from the subsequent proceedings have been published in 15 volumes as *Trials of War Criminals Before the Nuernberg Military Tribunal Under Control Council Law No. 10* (Washington). The Audiovisual Archives Division of the National Archives and Records Service has custody of motion pictures and photographs of all 13 trials and sound recordings of the IMT proceedings.

Martin K. Williams arranged the records and, in collaboration with John Mendelsohn, wrote this introduction.

NATIONAL ARCHIVES MICROFILM PUBLICATIONS

Roll 94

Target 1

von Schnitzler(part)

9-Loose Copies

NATIONAL ARCHIVES MICROFILM PUBLICATIONS

Defense
Case 6

TRANSLATION OF DOCUMENT BOOK 9 SCHMITZLER
OFFICE OF CHIEF OF COUNSEL FOR WAR CRIMES

DOCUMENT BOOK IX

For

Dr. Georg von SIEHMEIER

SUBMITTED TO MILITARY TRIBUNAL VI

IN CASE VI

By

Dr. Walter SIEMERS

Attorney-at-Law in Hamburg



Aug.

Table of Contents

of Document Book IX

for Dr. Georg von S C H N I T Z L E R

Documents No. 156 - 177, pages 1 - 90.

Schnitzler No.	Exh. No.	Description of Document	Page
-------------------	-------------	-------------------------	------

Group responsibility.(Responsibility according to Control CouncilLaw No. 10, Article II, subsection 2 e).

(As a group in this meaning the Prosecution designated among others: the Reich Group Industry, Economic Group Chemical Industry, and I.G. Farbenindustrie A.G.)

156

Accepted by the Military Tribunal in the Flick Case as Weiss Exh. No. 10 Opinion of Attorney-at-law Th. Alofsch, Cologne, regarding Control Council Law No. 10, Article II, 2 e, concerning criminality of membership in an organization connected with the commission of a crime as defined in Law No. 10.

1. In so far as a group is not based on a voluntary union of its members, Article II, 2e, does not apply.
2. A member of a so-called group can, at most, be punished if he participated in crimes of the group in the form of participation defined in regular criminal law, outlined under a - d of the Control Council Law, or, by virtue of the generally recognized principles, while conscious of the illegality and willfully, incurring his own personal guilt.

1 - 30

DOCUMENT BOOK 9 SCHNITZLER

- 2 -

Schnitzler No.	Sch. No.	Description of the Document	Page
157		Affidavit <u>Leonhard Spinner</u> , Schnitzler was admitted to the National Socialist Party in 1937 without endeavouring or applying for it.	31-32
158		Affidavit <u>Johann Georg Hartmann</u> , "fictitious membership" in the NSDAP because of economically exposed position.	33-34
159		Affidavit <u>Dr. Friedrich Krebs</u> , Lord Mayor of the city of Frankfurt/Main, from 1933 till 1945. In conversations with Dr. Krebs, the Gauleiter Spranger "used to call Schnitzler the filthiest names, like liberalist, capitalist, profiteer, hairsplitter." Other controversies with the Party: Herr Avisny, who was the Gauleiter's agent was not admitted as a member of the Aufsichtsrat although the Gauleiter continuously urged it.	35-38
160		Affidavit <u>Hela Dubois</u> , secretary of the board of directors in the management department of Farben. "The salute 'Heil Hitler' was not customary in the office of Dr. von Schnitzler". On the occasion of a speech made by a speaker of the Gau in the I.G. building in Frankfurt, Schnitzler told the witness: "You just stay away, what do you want to listen to that nonsense for". In 1940 the witness was arrested by the Gestapo, she was, however, re-employed in her position after her release from detention, against the wish of the National Socialist Vertrauensrat.	39-41

DOCUMENT BOOK 9 SCHNITZLER

- 3 -

Schnitzler No.	Exh. No.	Description of the Document	Page
161		Affidavit <u>Dr. Fried Luebbcke</u> , present City Councillor of the City of Bad Homburg. At the instigation of the Party a flying squad intended to arrest the witness in 1934. Schnitzler granted to him safe asylum in his house and took him in his own car out of the city over the Thunus to a safe place, although the roads were blocked by SA patrols. To Schnitzler, "the cos- mopolitan grandseigneur, international peace was the air he needed for life."	42-45
162		Affidavit <u>G. Milges</u> , Catholic priest of the Holy-Cross-Church in Frankfurt/Main. Religious attitude of the Schnitzler family and controversies with the Party resulting therefrom.	46-48
163		Affidavit <u>Heinrich Gaud</u> , Consistorial Councillor, Priest of the St. Antonius Church in Frankfurt/ Main, "brave demonstration of Christian faith".	49-51
164		Affidavit <u>Wilhelm Prosenius</u> , Protestant minister in Frankfurt/Main. "Christian and humane spirit" prevailing in the Schnitzler family. When the minister was arrested in November 1939 for political reasons, Schnitzler intervened on his behalf with the Gestapo, the Gauleiter's office, etc., by means of an attorney.	52-54
165		Affidavit <u>Erich Dombrowski</u> , editor-in-chief of the "Frankfurter Generalanzeiger", Schnitzler's positive attitude towards the professionally slandered and socially shunned witness, whose Jewish wife was committed to a concentration camp. Schnitzler's friendly attitude towards Jews in professional and social matters.	55-56

DOCUMENT BOOK 9 SCHNITZLER

- 4 -

Schnitzler No.	Exh. No.	Description of the Document	Page
166		Affidavit <u>Rolando Baldacci</u> , Director of the firm of A.R.C.A. of Milan. 1. Schnitzler did not believe in a coming war up to the last. 2. Material assistance by Schnitzler for persons persecuted for racial reasons in Italy. 3. I.G. never made an attempt to place the Italian firm at the service of National Socialist policy	57-58
167		Affidavit <u>Dr. jur. Freiherr Kurt von Leraner</u> , President of the German peace delegation to Versailles, where the witness had official contact with Schnitzler. Schnitzler "not even slightly affected by National Socialist ideas."	59-60
168		Affidavit <u>Dr. Max von Bruck</u> , editor of the "Frankfurter Zeitung" up to the date the newspaper was compelled to close. Schnitzler obtained for the witness a position with the I.G., despite the latter's being barred from exercising his profession.	61-62
169		Affidavit <u>Benny Reifenburg</u> , now chief editor of the review "Die Gegenwart". After his dismissal from the editorship of the "Frankfurter Zeitung" on 1 May 1943, the witness, as a half-Jew, was directly endangered and had to escape; he was assisted by Schnitzler.	63-64
170		Affidavit <u>Severin Beyer</u> , gardener with the Schnitzler family. In 1940 the witness was arrested by the Gestapo and he owed it to Schnitzler that he was not committed to the concentration camp.	65-66

Schnitzler Doc. No.	Exh. No.	Description of Document	Page
171		Affidavit <u>Camilla Schenk Freifrau von Stauffenberg</u> , née <u>Lady Camilla Ashosen</u> , niece of Sir <u>Alexander Cadogan</u> , wife of the cousin of Colonel <u>Graf Stauffenberg</u> , who personally executed the attempt on Hitler's life on 20 July 1944. Although they were threatened with being taken to account with the whole family (<u>Sippenhaftung</u>), and despite the direct attacks made in public by <u>Gosslers</u> and <u>Dr. Ley</u> against the witness and her husband, Schnitzler maintained his relations to the married couple and showed it in public.	67-68 67-68
172		Affidavit of <u>University Professor Dr. Erwin Ruge</u> . Schnitzler told the witness in 1942: "In the course of the world's history one generally was afraid of starting wars and also had enough sense of responsibility towards one's own people to break off hopeless wars at once. The strange thing about this crazy war is that Germany continues this war, although it was decided long ago, yes, already from the very beginning."	71 - 72
173		Affidavit <u>Theodor Hornbostel</u> , <u>Austrian Envoy and Minister</u> . Although the witness had been in a concentration camp because of political objectionability and was only provisionally released, he was, at Schnitzler's instigation, employed with the I.G.	73-74
174		Affidavit of the artist <u>Georg Bock</u> . The witness was counted by the Hitler regime among the "degenerate artists" and due to this encountered financial difficulties. In order to help him, Schnitzler entrusted him in 1935 with a great order, namely the "execution of a large mural" in the dining room of the casino in the I.G. skyscraper.	75-76
175		Affidavit <u>Augusta Brunnabend</u> . Controversies which Schnitzler incurred with the Party because of friendly attitude towards Jews. When in January 1944 Frau Brunnabend was removed to Theresienstadt, to the concentration camp, Schnitzler cared for her child.	77-78

Schnitzler No.	Exh. No.	Description of Document	Page
176		<p>Affidavit of <u>Fräulein Liselotte Mueller-Comradi</u>, daughter of the Titular Director of the I.G. deceased in 1945. There was a "very close confidential relationship" between father and daughter, especially after the death of the mother. The father was an "absolute opponent of the Nazi regime". "But of the gassing of human beings at Auschwitz my father never made any mention at all to me". He only spoke of deplorable conditions which generally prevailed in the concentration camps, stressed, however, that the I.G. did everything in order to alleviate the fate of the prisoners who were working at the I.G. Auschwitz plant.</p> <p>The witness declared it to be impossible that her father knew anything about gassing, even as a rumour, and that he might have told something different to other persons.</p>	79- 80
177		<p>Affidavit <u>Dr. Hans Kayler</u>, Schnitzler's closest co-worker in the management department of Farben, submitted in order to shorten the interrogation in the stand. The witness delivered this affidavit in March 1947, at a date when he was still at liberty and could not yet anticipate that he would be indicted.</p> <p>Deposition concerning:</p> <ol style="list-style-type: none"> 1. Schnitzler's position in the international dyestuffs industry. The International "dyestuffs" Convention was based on Schnitzler's initiative and his attitude aiming at an international corporation. <p>Schnitzler's international position, especially his relations to the leading personalities of the international dyestuffs industry abroad, namely:</p>	

81-90

DOCUMENT BOOK 9 SCHNITZER

Doc. No. 156

I, Dr. Walter Siemars, Attorney-at-law in Hamburg,
at present Defense Counsel before the American Military Tribunal
at Nuernberg, herewith certify that the attached document:

Opinion of Attorney-at-law Theodor Klöffel
regarding Control Council Law No. 10, Article II, 2 e,
was copied word for word. The Document was submitted to the Military
Tribunal IV by the Defense in Case V (Flick Case), as Document
Weiss No. 1012, and accepted by the Military Tribunal as Exhibit
No. 10.

Nuernberg, 3 March 1948.

(Dr. Siemars)

Weise Document No. 1012

Attorney at Law Th. Klofisch
Cologne, Blumenthalstr. 23
Tel: 74593

August 1947

Can a person be convicted of the crime⁸ against Peace, War Crimes and Crimes against humanity as defined in Article II 1 of Control Council Law No. 10 only, because he was a member in an organization or group connected with the commission of these crimes (Article II 2 c of the Control Council Law) ?

I.

Control Council Law No. 10 of 20 December 1945 (KRG)
defines under Article II 1, a)-c) the crimes against Peace,
War crimes and crimes against humanity and adds under d)
the further crime of membership in certain categories of a
criminal organization or group the criminal character of which
has been determined by the International Military Tribunal (I.M.T.).
Under II. 2 of this Article forms of participation in these crimes
are enumerated. This provision reads as follows:

2. Any person without regard to nationality or the capacity
in which he acted, is deemed to have committed a
crime as defined in paragraph 1 of this Article, if he was
- a) a principal or
 - b) was an accessory to the commission of any such
crime or ordered or abetted the same or
 - c) took a consenting part therein or
 - d) was connected with plans or enterprises involving its
commission or

- 2 -

- e) was a member of any organization or group connected with the commission of any such crime or
- f) with reference to paragraph 1 a), if he held a high political, civil or military (including general staff) position in Germany or in one of its Allies, co-belligerents or satellites or held high position in the financial, industrial or economic life of any such country.

Regarded from the standpoint of the technique of criminal legislation, this provision is unusual. In statutory criminal law the legislator as a rule confines himself to determine and to define more or less clearly the objective facts of the offence without making any provisions, what persons have to be regarded as guilty of the offenses thus defined. The question, whether the internal facts have been realized, whether the offenses have been culpably committed and whether a person has criminally participated in them, is decided according to general principles of criminal law, which are at least partly codified in the penal legislation of most countries, but are not thus codified e.g. in Anglo-Saxon-law; for the rest they are interpreted, developed and completed by the science of law and by Jurisdiction. Therefore also the Charter of the IMT of 8 August 1945, which under Article 6 defines the crime against Peace, the War Crimes and the Crimes against Humanity in all essentials in the same manner as the Control Council Law, contains no such provision concerning the form of participation in the crimes. In spite of that the IMT

found a way to indict and convict the guilty persons on the strength of the generally recognized principles of penal law. Consequently the fact, that the forms of participation have been included in the text of the Control Council Law, poses the question, for what purpose this was done. Is it the aim of this provision merely to lay down generally valid principles concerning guilt and participation, or is it intended to lay down new directives going beyond the forms of guilt and participation hitherto generally recognized?

- 1.) New or extended forms of guilt and participation are probably out of the question, as far as the forms of participation listed under Art. II a) - d) of the Control Council Law are concerned. No further proof is needed, that the principal mentioned under a), i.e. the person, who realizes the objective and subjective facts of the offense, is guilty. The same may be said of the accessory to the commission of crimes mentioned under b), or of the person, who ordered or abetted them. In the German text the word "abetted" is rendered by "begünstigt hat", this translation is inaccurate. The "Abettor" is identical with the "Anstifter" German Penal Law, but not with the "Begünstiger" of Art. 257 of the German Penal Code, the "accessory after the fact". The taking of a consenting part mentioned under c) and the connection with plans or enterprises involving the commission of the crimes mentioned under d) coincide with the "physischen oder tatigen Beihilfe" of Art. 49, Penal Code.

- 4 -

It may therefore be stated, that the forms of participation systematically defined in Articles 47-49, Penal Code, coincide with those of Art. II 2 a) - d).

2.) Quite a different view has to be taken of the form of participation under II 2 f) of the Control Council Law, according to which any person is considered guilty of the crime against Peace (but not of War Crimes and of Crimes Against Humanity), who held certain elevated positions. This is a provision unknown in modern penal legislation, science of law and jurisprudence. It constitutes a radical break with the idea of guilt prevailing in all systems of penal law. There is no way to assimilate it to this idea by means of interpretation. As shown in the foregoing, provisions a)-d) comprise all possible forms of culpable participation in the crimes of the Control Council Law, as far as they have been hitherto known. If this is true, then provision f), which has been added as an independent provision to the foregoing ones, admits of no other interpretation in keeping with its clear text, than that the legislator wants to establish a causal connection involving guilt between the holding of the above mentioned high position and the realization of the crime against Peace; this position is, then, supposed to establish the irrefutable presumption (*praesumptio juris et de jure*) of the culpable commission of the crime against Peace.

- 5 -

In the penal law of former ages such presumptions of guilt were by no means rare. We may remember the witch trials. In the case of certain offenses, e.g. tax or customs offenses, they remained partly in force till modern times. As the knowledge of the nature and purpose of punishment by the State advanced and as the principle of liability for successful criminal acts was superseded by the principle of guilt, they became more and more extinct. For more than a generation they have everywhere been altogether eliminated for serious and very serious crimes like the crimes defined by the Control Council Law. A person can be convicted of such crimes only, if he has committed them culpably and in full consciousness of their illegality, which on principle means that he committed them or at least contributed to their commission wilfully (not only negligently), and he can be convicted only on the strength of proven guilt. These fundamental principles of material and procedural criminal law have become common property of all civilized states. They are above all statutory law. The legislator of every State is bound by them. Also the victor Nations have from the beginning and repeatedly declared solemnly and expressly, that they do not think of taking revenge and of putting the victor's might in the place of right. The principles developed above are therefore also elements of the laws enacted for the occupied territories.

- 6 -

Possible regulations in conflict with these principles^a are invalid. Therefore it must be stated, that the provision of Art. II 2 f), which is contrary to the principle of guilt, is not effective.

Apart from that this provision is incompatible with the Law of the London Charter of 8 August 1945 and with the principles binding for the present proceedings, which were laid down by the IMT in its decision against the principal war criminals of the European Axis.

Apparently because it recognized this, the Prosecution has not used provision II 2 f) of the Control Council Law in the indictments hitherto lodged including the indictment in the present case against Friedrich Flick et al.

G.) However, the Prosecution in the indictments against Flick et al (Case V) and also in the indictments of Case No. VI (I.G. Farben) based its charges not only on the facts defined by provisions a) - d), but also on provision II 2 e) of the Control Council Law, and gave as reasons for the indictment, that the Defendants

"were members of organizations and groups connected with the enslaving and deportation for slave labor on a gigantic scale of members of the civilian population of all countries and territories under German occupation or otherwise controlled by Germans....."

(Bill of Indictment P. 3).

- 6 -

and

"connected with the plunder of public and private property, spoliation and other offenses against property in countries and territories, which in the course of the aggressive war waged by Germany were under German military occupation ..."

(Bill of Indictment P.8)

The following organizations and groups are designated as connected with the specified war crimes and crimes against humanity, in the Bill of Indictment and in the Opening Statement of the United States of America dated 19 April 1947:

the Reich Association Iron (Reichsvereinigung Eisen, RVE)
the Reich Association Coal (Reichsvereinigung Kohle, RVK),
the Economic group Iron producing Industry and its organizations,
the Small Circle (Kleine Kreis) of Chiefs of the North-West,
Group Iron producing Industry,
the Danjopr-Stahl G.m.b.H. and the Berg- und Huettenwerksgesellschaft Ost
G.m.b.H.(BEO)
the Group of the Friends of HITLER (Circle of Friends and
KEPPLER circle).

See original of Bill of Indictment P. 4, 5, 8, 9, 10, 12 and
Opening Statement Pages 39-45, 48, 49, 51, 52, 88 sqq.
and 93 sqq.

II.
--

What is the meaning of the provision of Art. II 2 f) of the Control Council Law? Is it intended in the same way as provision f) to define a form of guilt and "participation in no connection with the principle of guilt, so that the members of an Association connected with the crimes and defined in Art. II 1 must be automatically considered guilty of these crimes? Or is it possible to interpret this provision in such a way, that only those members of such an association can be convicted of crimes against Peace,

war crimes and crimes against humanity, who can be proved to have participated in these crimes in one of the generally recognized forms of guilt, while knowing of that the association was connected with these crimes?

This question forms the subject of the following argument.

1.) My argument confines itself to this question. Therefore I shall not investigate the factual and legal prerequisites of participation in the crimes of Art. II 1 as defined in the provisions under II 2 a) - d) and I shall not discuss the numerous and difficult problems of international and penal law arising in this connection, as far as they are irrelevant for the question.

I may point out already in this place, that provision 2), which I am going to discuss, would become of no importance for the question of guilt, in case the Defendants should be found guilty already under the provisions a)-d). In this case it would be irrelevant at least for the question of guilt, whether they were members in an association connected with the crimes of the Control Council Law. We may assume, that this is already expressed by the first sentence of Art. II 1:

"without regard to ... the capacity in which he acted, is deemed to have committed a crime as defined in paragraph 1 of this Article"

- 9 -

Provision a) becomes important for the question of guilt only, if no guilty participation of the Defendant in the crimes of Art. II 1 as defined in Art. II 2 a)-d) exists or can be proved. Only then the question arises, whether the Defendants, who were members in an association mentioned in this provision have automatically become guilty of the crimes of the indictment and must therefore be punished.

2.) It seems, that the Prosecution itself does not attach any decisive importance to form a) of participation as far as the question of guilt is concerned; perhaps the Prosecution knows or has a subconscious feeling, that according to law and precedent it cannot create a complex of facts which establishes guilt. It is true, the Prosecution introduced the form of participation established by Art. II 2 e), when formulating Counts I, II, and IV of the Indictment (but not Count III). However, it follows from the reasons given in the Indictment and especially in the Opening Statement, that the Defendants are in all cases indicted as principals or accessories or for another of these forms of participation in the crimes of Art. II 1, which are defined by Art. II 2 a)-d). Wherever the Defendant's membership in one or other of the associations mentioned under a) is referred to, it is stated, that the Defendants, when they were members of these associations, i.e. when they were in a capacity, which after the preceding principal clause becomes irrelevant, in fact also participated in the crimes of the Control Council Law as principals, accessories etc., i.e. in the forms a)-d).

- 10 -

If this interpretation of the Indictment and of the Opening Statement is true, we may consider this an important argument in favour of the results of the following explanations.

We can anticipate these results already here. They are summed up in the sentence, that provision e) can be and must be interpreted in such a way, that the members in the organizations and associations mentioned under e) can be considered guilty of crimes against the Peace, war crimes and crimes against humanity only, if they participated in the crimes by causing them in some manner, which involves their guilt. Under this point of view it can certainly not be admitted, that provision e) means an independent, new, hitherto unknown form of guilt and participation.

III.

1.) Provision of Art. II 2 e) is to the effect, that any person is deemed guilty of a crime as defined under paragraph 1 of this Article, who was a member in an organization or group connected with its commission; if we look at it in connection with provisions a)-d) and f), we might assume at first sight, that the legislator considers mere membership

- 11 -

of the crimes of the Control Council Law, without any proof being necessary that the Defendants committed the crimes or participated in them; it may even appear unnecessary, that the Defendants knew of the connection of the organization with the crimes of the Control Council Law. This interpretation seems to be borne out by the text and by the fact, that provision e) is on the same level with the preceding provisions a)-d). In favour of this interpretation the following reason for the provision ratio legis might be assumed. Membership in such a criminal organization justifies the irrefutable presumption of guilty participation in the crimes of the Control Council Law; the same argument might be used in the interpretation of provision f).

We have already stated that such an interpretation would be untenable, and why it would be so. However, provision e) in contrast to f) - allows of another interpretation reconcilable with the principle of guilt. But then this interpretation must, of course, be preferred and accepted, because it is recognized that the principle "in dubio pro reo" (in doubt the decision must be for the Defendant) extends also to the interpretation of rules of law.

- 12 -

- 12 -

This interpretation leads to the following observations
and conclusions:

- 1.) First of all an organization or group must exist, if we want to interpret provision a). No difference between organization or group may be recognized. An organization is everywhere understood to mean the combination of several persons in pursuit of a common aim for a period of time under a common direction and with division of labour. It is an essential prerequisite, that combination must be voluntary, i.e. must be of the nature of a contract. Concerning this the Judgment of the IMT states in section 9 with reference to the organizations indicted in this trial:

"A prerequisite is the existence of a group, which is firmly combined and organized for this common aim. .. The declaration concerning the organizations will, as has already been emphasized, define the criminal character of their members; therefore this declaration should eliminate those, who have been drafted for membership by the state."

- The same must hold good for the organizations mentioned by provision a). For voluntary combination is simply an essential characteristic of all organizations or groups.
- For the rest there is no difference as to concept the organizations declared criminal by the IMT and the organizations mentioned under a). The

- 13 -

former are part of the latter. Both are marked in the London Statute and in the provision e) of the KRG (Kontrollratsgesetz; Control Council Law) by their connection with war crimes.

The judgment of the IMT states in this respect:

"Condition is from the outset that a group that is to be declared criminal was formed or made use of in connection with the crimes stigmatized by the Statute."

The IMT wants consequently the same ^{or} criterion, the connection with the crimes of the Statute, as the provision e) of the Control Council Law; connection with the crimes of the same kind - of the Control Council Law. The fact that the criminal character of the groups declared criminal by the IMT cannot be denied in the subsequent proceedings in view of art. I of the Statute, whilst, according to the provision e) of the Control Council Law, this character would have to be investigated and ascertained in the present proceedings, is, of course, not incompatible with the abstract identity of the organizations mentioned here and there. If, therefore, this identity cannot be denied, the voluntariness of the union to , has to be supposed, pursuant to the decision, based on principle, of the IMT, for the organizations in the provision e). The question whether this decision of the IMT is binding in the present case, is to

be discussed later. An association the members of which did not join voluntarily, whose union is based, on the contrary, on a legal or other public order, has therefore to be eliminated, from the outset, for the interpretation of the provision c). Consequently the tribunal has to investigate first whether the associations mentioned in the indictment are based on a voluntary or stipulated union of the members or on public compulsion. This last hypothesis is probably the right one in the case of the Reich Association Coal (Reichsvereinigung Kohle) (RVK), for according to the decree of the Reich Minister of Economy (Reichswirtschaftsminister) dated 21 April 1941, the day of the foundation of the Reich Association Coal (Reichsvereinigung Kohle) (RVK), all coal producers and dealers and their economic unions are members of this association. This order is based according to the preamble on the law concerning compulsory cartels dated July 15, 1933 (Reich Law Gazette - RGBl. - I, page 488) and on the agreement concerning mergers in the industrial economy dated 4 September 1939 (Reich Law Gazette - RGBl. - I, page 1621). The same is true for the Reich Association Iron (Reichsvereinigung Eisen) (RVE) set up by the Reich Minister of Economy ²⁹ May 29, 1942 pursuant to the same legal provisions. Compulsory members of the Reich Association Iron are all iron producing etc. associations. Finally, members also of the economic group "Iron producing industry" - the statute of which was issued pursuant to the first decree for carrying out the law designed to prepare the organic structure of the

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 156

WEISS (FLICK) DOCUMENT No. 1012
EXHIBIT No. 10

- 15 -

German Economy dated 27 November 1934 - were, by order of the Reich Minister of Economy, all entrepreneurs and enterprises that produced certain products in factories (see Doc. Books VI, VII, and VIII).

Given these circumstances and legal position, it is not possible, I think, to talk about a voluntary union of the members of these three associations. Their members can, therefore, not be called to account, according to criminal law, for the crimes of the Control Council Law pursuant to the special provision c), unless their personal participation in these crimes is proved, in this case they are liable already according to the provisions a to d).

Concerning the "Ostland Berg- und Huettenwerke Ges.m.b.H." (BHO) (Eastern territory Mines and Smelting works limited liability company), the application of the provision c) has to be verified, too. Here it has to be noticed that the Reich Minister of Economy informed the partners on August 4, 1941, that the Reichsmarschall (Reich Marshal) ordered within the Four Years' Plan - a monopoly company to be set up, in the occupied territories, for utilization of the work installations of these industrial branches by the partners. Insofar, in this case, too, there is probably compulsion on the part of the state. Incidentally it appears at least doubtful, whether a G.m.b.H., and Aktiengesellschaft or any other

- 16 -

commercial company must be regarded as an organization or group in the sense of provision e), as is presumed by the Prosecution e.g. in the case against I.G. Farben regarding this Aktiengesellschaft. This opinion is hardly in keeping with general linguistic usage and legal terminology.

Furthermore it will be difficult to answer the question who has to be called a member of this commercial company. Are the partners, the stockholders, the leading officers or the employees such members, even if not having any capital in the enterprise? All these questions require clarification, which it is very difficult to give in view of the narrowness of provision e). Obviously the tribunal would have to define its standpoint in this and the subsequent questions only, if it had been established, that the organizations concerned were formed by voluntary association.

2.) A second prerequisite for using provision e) would be, that the organizations listed by the Indictment were connected with the commission of the crimes defined in Art. II, 1. What is understood by such connection and how is the Tribunal to establish it?

a) This poses one of the most difficult questions, the difficulties and problems of which became manifest in the arguments before the IMT

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 156

WEISS (FLICK) DOCUMENT No. 1012
EXHIBIT No. 10

- 17 -

concerning the concept "criminal organization". In accordance with Art. IX of the Charter of the IMT this tribunal was entitled to declare an organization criminal, if and when it had established its criminal character. The IMT has established such a character for certain more closely defined groups of these four organizations. This decision was the result of three days' deliberations taking place between 28 February and 2 March 1946, during which the legal prerequisites of the declaration of criminality and the concept "criminal organizations" were amply discussed between the Prosecution and the Defense with the Tribunal taking part in the discussions, furthermore it is based on a decision pronounced by the Tribunal on 13 March 1946, which attempted to clarify the questions under discussion and to define the concept "criminal organization", as well as on extraordinarily extensive evidence as to the criminal character of the accused organizations. The Author at the request of the Defense Counselors gave his opinion on these problems in two memoranda submitted to the Tribunal under dates 5 June and 15 August 1946. We refer in this connection to the Transcript of the proceedings of 28 February to 2 March 1946, to the decision of the Tribunal of 13 March 1946 and the just mentioned memoranda. They are probably of fundamental importance for the understanding

- 18 -

- 18 -

of the question put by us and of the decision of the IMT regarding the accused organizations under Section 9 of the Judgment. In particular we refer to the general observations on Section 9) of the judgment, which will be discussed in detail in the following.

b) The question, whether an organization is connected with the commission of crimes, is very closely bound up with the question, whether groups of persons as such are altogether punishable for offenses. Provision c) speaks about the connection of organizations with the commission of war crimes; this can hardly mean anything else or less, than saying: organizations, which have taken part in these war crimes. Connection can in this case only be equivalent to causal connection. The organization must have contributed some causal condition for the crimes. The words of the English text "connected with" give a better and correcter illustration of this, than the inaccurate German translation: "In Zusammenhang stand." In the present Bill of Indictment the word "verknüpft sein" is accordingly used instead of the word "Zusammenhang".

Can groups of persons as such commit any crime or create a causal condition for crimes? This question is today answered strictly in the negative ^{by} penal legislation and by the science of penal law.

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 156

WEISS (FLICK) DOCUMENT No. 1012
EXHIBIT No. 10

- 19 -

in all countries, and the reason given is, that only individual persons can realize the objective and especially the subjective facts of a crime and that only such individuals can be punished with the penalties provided for serious and very serious crimes such as the death penalty and imprisonment, which are mainly imposed in the case of war crimes. Anglo-Saxon law allows to a limited degree certain organizations, especially of a political and economic character, to be punished for offenses committed by their officers in the sphere of activity of such organizations, e.g. for a fraudulent money /this is done for mere reasons of expediency. By punishing the transaction of a banking company; but it is intended to prevent delivery/ further offenses of their officers. Possible penalties are of course only pecuniary fine, confiscation of property, suspension or dissolution, which do not immediately affect but only remotely hit the members of the company. The individual members of the company can be sentenced only, if they personally, causally and culpably participated in the offenses committed within the company. It is nowhere legal to punish members of an organization for very serious crimes, such as war crimes, only because of their membership and without establishing a personal culpable participation in the

- 20 -

- 20 -

crimes. This is true also of Anglo-Saxon law. Such a punishment would contradict the supreme principle of the penal law of all civilized states:

"No punishment without proven penal guilt."

Penal guilt means the reprehensibility of a certain act or commission. Only a responsible individual can incur such guilt, who infringes a penal law while conscious of its illegality and - in the case of serious crimes - wilfully, i.e. with full knowledge and intention of all characteristics of the facts of the offense.

c.) This principle, which is recognized everywhere as a fixed dogma, has been proclaimed by the IMT in its decision on the accused organizations, when it stated:

"The decision of the Tribunal - it is to be noted, that it had been left to the discretion of the Tribunal to declare the organizations criminal - must be carried out in harmony with recognized legal principles. Among the most important of these is the principle, that penal guilt is a personal guilt and that mass sentences are to be avoided."

Furthermore the Tribunal emphasizes in the general observation of Section 9:

"On the other hand the Tribunal should make the declaration of an organization as criminal as far as possible in a way which guarantees, that innocent persons will not be punished."

Having enunciated this principle the Tribunal goes on to state:

- 21 -

"A criminal organization to this extent resembles a criminal conspiracy, that in both cases the collaboration for criminal purposes is the essential characteristic."

Finally the Tribunal says a few sentences later:

"Because, as already emphasized, the declaration concerning the organizations and groups will define the criminal character of their members, this declaration would have to exclude those who had no knowledge of the criminal purposes or acts of the organization, as well as those, who had been drafted by the State for membership, provided they have not personally taken part in acts declared criminal by Art. 6 of the Charter. Mere membership is not sufficient for being affected by such declarations."

By stating these legal principles the IFT clearly rejected the doctrine, that groups of persons are as such capable to commit crimes and liable to punishment, and established:

that mere membership in an organization is not sufficient for being affected by the declaration, that the organization concerned is criminal, which declaration determines the criminal character of its members; that the member of an organization, even if war crimes have occurred within the organization, can be punished only if his personal guilt has been established;

that collaboration for criminal purposes is an essential condition for an organization becoming criminal in the sense of the London Charter (and therefore also in the sense of the Control Council Law according to the explanations under 1.)¹ as well as for conspiracy being criminal.

- 22 -

d.) The last named principle decides best and clearest the question put by me first of all, what must be understood by an organization in the sense of provision e), which is connected with the commission of the crime as stigmatized by the Control Council Law. It is the nature of conspiracy, an offense peculiar to Anglo-Saxon Law, that several persons combine for criminal purposes and, according to the expression used by the IKT, collaborate for these purposes. According to this definition the conspirators are liable to punishment, even if the intended crimes are not committed. If they are committed, either by some of the conspirators or even by third persons, each conspirator is responsible for the offenses committed in the course of the carrying out of the conspiracy therefore only the conspirators are guilty and punishable, i.e. those persons, who have combined for criminal purposes and have collaborated to this aim. Collaboration is meant to be the essential characteristic.

If the same applies to the criminal organizations as defined by the Charter and by the Control Council Law, only such organizations and groups can be called criminal in the sense of these laws, in which, in the same way as in a conspiracy, all members have combined and collaborated for criminal purposes, in this case for war crimes, that ~~impl.~~ that each individual member knows of

- 23 -

the intended or committed crimes and supports them or is at least willing to support them. If such war crimes are committed only by some or by the majority of the members of the organizations, or by their officers or leading personages, this is already sufficient reason, why the concept of an organization or group in the sense of provision a) is no more applicable.

c.) Even if this logically cogent conclusion is not accepted, it must be in all circumstances concluded from the context of the above quoted principles of the IMT Judgment, that no person can be deemed guilty of the crimes of the Control Council Law in spite of the membership in one of the criminal organizations, who has not personally participated somehow in the commission of these crimes or at least wanted to participate in it, and who has not "collaborated" with the other members in these crimes in full knowledge of the organizations' criminal aims, who, in a word, has not supported these crimes or did not want to support them. It is a question of fact, whether membership as such can in certain circumstances constitute a support of the purposes and actions of an organization. But it always remains a condition, that the members' ⁿ intention was aimed at such support.

- 24 -

As a rule we can assume such an intention as proved only, where an active participation in the crimes of the Control Council Law can be established. In the case of the organizations set up by decrees of the State we are justified to presume *prima facie* the absence of such an intention of support as far as war crimes are concerned.

3.) It might be objected, that the conception here advocated is at variance with the decisions of the IMT against the accused organizations, because this tribunal itself declared various organizations or groups, i.e. associations of persons, criminal and that this decision does not agree with the principles laid down by the tribunal itself.

These contradictions are only apparent. If we further penetrate into the matter and into the reasons of the judgment, they can be dissolved.¹

a) First of all it must be remembered, that the fact, that certain organizations or groups have been declared criminal by the IMT, has according to Art. I of the London Charter only this consequence. For the members of the groups thus convicted, that these can be punished for membership in this group. Nobody had in mind, that membership in the organizations declared criminal must necessarily result in the member

- 25 -

being convicted of the serious war crimes. In the proceedings now pending before the German Spruchkammer of the British Zone, where the offense of membership is the subject of trial, ^u indictment and judgment is confined to this offense. Only if the members of these organizations can be charged with participation in a war crime, they are tried for this, and this is done before the national military Tribunals.

In contrast to this the members of an organization in the sense of provision a) of the Control Council Law would have to be convicted automatically of serious war crimes, if this provision were interpreted in this sense, that the members are to be deemed guilty of the war crimes on account of mere membership in these organizations. Already this consideration confirms our interpretation of provision a) as right and necessary and forbids to convict the members of the organizations of war crimes, provided their participation in such is not proved. Every other interpretation of provision a) would lead to the members of the groups declared criminal by the IMT being automatically ^y not only found guilty of the smaller crime of membership but also of the serious war crimes of the Control Council Law, if charged with them. For that the groups declared criminal by the IMT

- 26 -

constitute organizations connected, as is stated in provision a), with the commission of the crimes of the Control Council Law, cannot be contested, all the less, as the criminal character of these groups according to Art. I of the London Charter can be no more called in question in the subsequent trials.

b.) Our interpretation of provision a) is not in conflict with the decision of the IMT and the principles laid down in this decision for the further reason, that the groups declared criminal by the IMT in the opinion of this Tribunal exclusively consisted of such members, as knew of the criminal aims and actions of these groups or at least had the intention to support them. Therefore the IMT excluded or at least wanted to exclude from the conviction of the organizations all persons, who in spite of membership did not want to promote the organization, and made the declaration of criminality in a way which guarantees, that innocent persons will not be punished."

4.) We can sum up the arguments so far put forward in the following result:

c) As far as the organizations mentioned by the indictment are not based on voluntary association

- 27 -

of the members , the provision of Art. II B'n) is automatically not applicable.

b) The same holds good, if it is not proved, that all members of the organization knew of the crimes committed within the organization and collaborated for them with the others, supported them or wanted to support them.

c) Furthermore a member of the associations mentioned in the provision e) can be punished on account of the war crimes of the Control Council Law in any case only, if the member took part in these crimes in one of the forms of participation a) to d) of of the generally recognized principles on criminal guilt and criminal participation, realizing the illegal nature of the acts and with malice prepense.

d.) Members of the association in the sense of provision e), who did not want to support the criminal aims and acts of the associations, who were consequently, only nominal members, are not to be considered as members of or belonging to, the associations in the sense of this provision.

On account of this result, the provision e) has, it is true, to be called dispensable.

- IV -

Finally it has to be discussed briefly whether the legal principles stated in the judgment of the IMT applied for the

- 28 -

interpretation of provision e), are binding for the tribunal in the present proceedings.

Art. X of the Ordinance of Procedure No. 7 provides that

"Abominations of the IMT in Case No. 1 to the effect that ... crimes ... were planned or committed, are binding for all tribunals to be set up according to this ordinance and not to be called in question, unless the participation in, or joint knowledge of, such crimes is at stake with respect to a definite person."

To my mind, the principles of criminal law mentioned above under III 2 c) and discussed - which were stated by the IMT in the decision on the accused organizations, have to be considered as such decisions on crimes in the sense of Art. X of the ordinance No. 7. Art. X wants to state obviously that, if certain facts are legally considered as crimes by the judgment of the IMT, this is Case Law and is consequently binding for the tribunals of the zone. The provision in Art. X is similar to Section 358 of the German Code of Penal Procedure according to which the legal evaluation of the revision court (Revisionsgericht) is binding for the tribunal to which the case is being referred back. If this is correct, the binding force had to exist also for the legal principles stated by the IMT, which are taken as a basis for the evaluation of an act as a crime, both as to positive and negative definition. If, therefore, the IMT states the principle "No punishment without individual criminal guilt", or defines the conditions under which a member of a criminal organization can be punished on account of membership

- 29 -

in this organization or for commission of war crimes, these legal principles cannot be annulled or ignored by the following some tribunals.

Besides, these principles proclaimed by the IMT have to be generally authoritative - apart from possible other reasons - on account of the competence given to this tribunal by the victorious states and the United Nations and on account of its high authority recognized in public all over the world, the more so as they are in keeping with the generally recognized highest principles of criminal law. In so far they are, a priori, superior to all statutory law.

signed: Klopisch
(KLOPISCH)
Attorney

Affidavit.

I, Leonhard Spinnler, residing at 9 Muehlenstrasse in Ohrberg, district of Oehringen (Wuerttemberg), have first been warned that I will render myself liable to punishment if I give a false affidavit. I herewith declare that the following statement represents the truth and is made in order to be submitted as evidence to the Military Tribunal in Nuernberg.

From about 1932 till 1940 I had been working in the postal office of the I.G. Farbenindustrie A.G. in Frankfurt/Main which was located in the firm's main administration building. At the present time I am working for the electrical supply Schwaben (EWS).

The new plant manager, Dr. von Schnitzler, was addressed during an affair given by the plant as "Parteigenosse" (member of the Party) which attracted attention and was generally discussed although, to our knowledge, he was not at all a member of the Party. Thereupon, apparently as a result of this incident, Herr Schnitzler was informed in the office of his admission to the Party and given the Party insignia etc., without having applied for membership, which at that time was frequently criticised in the group of my fellow-workers.

Friedrichshausen, 7 March 1948

signed: Leonhard Spinnler.

I herewith certify and attest the above signature executed in my presence, Attorney Dr. Heinrich von Rospatt, by Leonhard Spinnler, residing in Ohrberg, district of Oehringen.

Friedrichshausen, 7 March 1948

signed: Heinrich von Rospatt

Attorney

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 158

Georg Hartmann

Frankfurt/Main W 13

Affidavit.

I, Johann Georg Hartmann, born on 13 July 1870 in Frankfurt/Main,
manufacturer, at present residing in Burgjoss near Bad.
Orb, have been duly warned that I will render myself liable
to punishment if I give a false affidavit. I declare in lieu
of oath that my statement represents the truth and was made
in order to be submitted as evidence to the Military
Tribunal No. VI at the Palace of Justice in
Munich, Germany.

signed: Johann Georg Hartmann

Frankfurt/Main, 20 February 1948

No. 153 of the Document Register for 1948

I herewith certify and attest the above signature, executed in
my presence, Attorney and Notary Dr. jur. Heinrich
Heerts, by Johann Georg Hartmann, at present
residing in Burgjoss near Bad Orb.

Frankfurt/Main, 21 February 1948

signed: Dr. Heinrich Heerts

Notary

Stamp: Dr. Heinrich Heerts,

Notary in Frankfurt/Main

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 158

Georg Hartmann

Frankfurt/Main W 13

Affidavit.

As a resident of Frankfurt I have known the family von Schnitzler very closely for many years. Only during the war did I have a chance, through personal contacts, to become familiar with Herr von Schnitzler's attitude with respect to economic and cultural matters in view of the fact that our tasks in business were different and Frau von Schnitzler, up to that time, was the principal person in our cultural connections. It was due to the course of events that the people of the same way of thinking were brought together so that in 1943 I could ask a favor from Herr von Schnitzler when in 1943 and 1944 he went to Spain and each time offered to transmit messages to my son and his family who were residing in Barcelona. At that time we had an opportunity to discuss our political views. I must say that, during these discussions, I found Herr von Schnitzler to be an all out opponent to the Hitler regime, to such an extent that I was simply surprised when told, after the surrender, that Herr von Schnitzler had been a member of the NSDAP (a fictitious membership which so many persons of his kind in high economic positions were compelled to submit to.) I therefore did not hesitate at that time to reveal my criticism in the reports and warnings which I sent to my son.

For the true valuation of this statement I have to say something about my own person:

- 2 -

I have not been a member of the NSDAP or one of its affiliated organizations. On the contrary, it is shown in the files of the DAF (German Labor Front) concerning my person and my enterprises, the Bauersche Giesserei Frankfurt/Main (foundry) (one of the leading type-foundries in Germany) and the EMMA, Gg. Hartmann, Frankfurt/Main turning out electro-medical and dental machinery, that I was strongly opposed to the NSDAP.

Frankfurt/Main, 8 April 1947

signed: Johann Georg Hartmann

No. 154 of the Document
Register for 1948 - - -

The foregoing signature, executed by the manufacturer Johann Georg Hartmann, Burgloss near Bad Orb, is herewith certified and recognized by me.

Frankfurt/Main, 21 February 1948

Stamp: Dr. Heinrich Hertz,
Notary in Frankfurt/Main

signed: Dr. Heinrich Hertz
Notary

Affidavit.

I, Dr. Friedrich K r e b s, born on 9 May 1894, residing in Schmitten (Taunus), have been duly warned that I will render myself liable to punishment if I give a false affidavit. I declare in lieu of oath that my statement represents the truth and was made in order to be submitted as evidence to the Military Tribunal No. VI at the Palace of Justice in Nurnberg, Germany.

1.) From 1933 till 1945 I was Lord Mayor of the city of Frankfurt/Main. In this capacity I have become acquainted with Georg von Schnitzler officially as well as personally. I do not exactly remember the time I met him first; it may have been in 1933. I was introduced to him, as far as I can remember, by his wife who had strong cultural interest and got in touch with me for that purpose. To my knowledge, she participated in the publication of a periodical, titled "European Review", and also in a cultural association, the "European Cultural League" but I do not remember any longer in what capacity. Both institutions, as it is already shown by their titles, had no nationalist aims but had exclusively European and international tendencies.

2.) In accordance with their belief, the Schnitzler family members carried on very extensive international connections. Most of the important foreign persons, especially economists from England, France, America and other states associated with the Schnitzler family, I was present at numerous social affairs of that kind and here and there the consular representatives of these states and foreign artists were also present, for this was the chance for me to come into contact with these international circles from which I expected a great advantage for the city of Frankfurt.

- 2 -

3.) It was obvious that, in the course of these conversations, political subjects were also discussed in which I participated. This made it possible for me to become familiar with Herr von Schnitzler's character and political thinking. I can only say that Herr von Schnitzler was anything but a National Socialist. According to his origin, career and his position in the greatest industrial concern, such an attitude was simply inconceivable. Towards me he did not make a secret of his attitude at all, for he knew that I repudiated the Gauleiter and this man's and the Party's power politics. It is true that the Gauleiter did not consider him a Nazi and the former, in conversations with me, used to call him the filthiest names, like liberalist, capitalist, profiteer, hair-splitter, etc. The Gauleiter, therefore, gave the Schnitzler family an outspoken ill reputation and indicated to me that both Herr and Frau Schnitzler were not to be trusted politically; he told me that I must not associate with these people any more. I have, of course, disregarded this prohibition because I esteemed both persons as intellectually and morally outstanding personalities and considered our association a great honor which appeared to me to be an absolute necessity in the interest of the city.

4.) If Herr von Schnitzler joined the SA and later on the Party (I do not remember the exact time) it was not based on a change in his way of thinking and on inclination towards National Socialism, but was the result of a certain pressure due to the circumstances. The situation was such that, as a non-Party member, he was constantly exposed to difficulties by Party members, as for example, questionings by the local NSDAP office etc. which in his position, as Director of the I.G., became simply untenable. I am therefore convinced that he took this step for purely tactical reasons in the interest of the enterprise he

- 5 -

represented, in order to protect this enterprise against the attacks by the Party. The membership in the SI can be explained from the fact that Herr von Schnitzler had taken an absolute social attitude, which . . . repeatedly came to my attention in conversations with him. Moreover, from my own knowledge I can only say that the social institutions of the I.G. were excellent and exemplary for its employees.

5.) His relations to the Gauleiter were decidedly cool, if not ⁱⁿ bad. As I have stated before, he was definitely/ ~~disreputable~~ ^{disreputable} ~~with~~ the former Gauleiter Sprenger. Moreover, I know from conversations with the Gauleiter that the latter was greatly indignant about Schnitzler's negative attitude towards his desires and plans. The Gauleiter, as far as I remember, wanted to get ^{the} persons, having his confidence, into the Aufsichtsrat of the I.G.. It was intended for instance, if I remember correctly, to have Wilhelm Avieny admitted, who was the Gauleiter's adviser and enjoyed his special confidence. The gentlemen of the I.G. objected and declared that in this case they would transfer the central offices of the I.G. to Berlin. Herr von Schnitzler, in conversations with me, had expressed these troubles and I have urged him not to carry out this idea by any means since it would have meant a disaster for the city of Frankfurt.

I furthermore know from a conversation with the Gauleiter that the latter had the intention to conduct a "purge" in the I.G. after the end of the war and to remove those directors who were not supporting the National Socialist ideas, among them also Herr von Schnitzler. Moreover, I still remember that, in a conversation with the Gauleiter during the war, Herr Avieny urged that Geheimrat Schmitt be replaced for the reason that the latter was directing the I.G.

- 4 -

guided only by motives of profit, and had liberal ideas. Such or similar were his words.

6.) Only the loss of the war has prevented the former Gauleiter Spranger from the realization of these intentions which also would have gravely endangered the city.

As concerns Herr von Schnitzler's attitude towards the war itself, I can only say that, in conversations with me, he condemned and most strongly expressed his regret about the war. In this connection he told me that on his trips to America he had seen the industrial capacity of ~~that~~ country and that it was a madness to fight against this industrial capacity. As a representative of the international trade he also was against all aspirations of autarchy and has called these restrictions on trade relations harmful to our own people. Moreover, he repudiated Adolf Hitler with the strongest words and called his conduct madness. I know from all these statements that Herr von Schnitzler was opposed to war. To me, he never mentioned a word of a plan for a possible war of aggression and, in view of the strict secrecy of such plans, I deem it out of question that he had knowledge thereof.

Concluding I like to add that The Hessian Minister for Denazification, Binder, has published a secret order, decreed by Spranger in 1945, according to which all citizens were requested to report those persons who doubted the successful end of the war, in order to render them harmless.

Muenberg, 16 March 1948

signed: Friedrich Krebs

I herewith certify and attest the above signature, executed in my presence, Attorney Dr. Walter Siemers, by Dr. Friedrich Krebs, residing in Schmitten (Taunus).

Muenberg, 16 March 1948

signed: Dr. Siemers,

Hein D u b o i s

Frankfurt/Main, 23 February 1948
Klaus Grothstr. 16

Affidavit.

I, Hein D u b o i s, born 11 December 1885 at Frankfurt/Main, secretary, residing at Frankfurt on the Main, Klaus Grothstrasse 16, have been made aware of the fact that I make myself liable to punishment by submitting a false affidavit. I declare on oath, that my statement corresponds to the truth and that it was made in order to serve as testimony before Military Tribunal No. VI at the Palace of Justice in Nurnberg, Germany.

In 1913 I joined the Firms Leopold Cassella & Co., a predecessor of the I.G. Farbenindustrie, as the secretary of Dr. Carl von Weinberg. When the offices of the individual firms were merged in the skyscraper of the I.G. Farbenindustrie, I held the office of a secretary of the directorate in the Farben directorate department since 1930.

In this position I have been in almost daily contact with Dr. Georg von Schnitzler, at first in his capacity as Director of the color Sparte and later on as manager in the skyscraper, and this, due to my general tasks and as substitute for his personal secretary. In the years after 1933, Dr. von Schnitzler maintained his always equally friendly demeanor towards me despite the general knowledge that I absolutely rejected National Socialism from the very first day. During all those years I never heard in private conversations with me or others, any comment by Dr. von Schnitzler which could have served as evidence of his positive attitude towards

- 2 -

National Socialism. Among others it was one of my tasks to take care of the local contributions and payment of membership dues, which in every instance had to be sanctioned by Dr. von Schnitzler as manager. Contributions for non-National Socialist social institutions, as for instance the Social Committee for Private Welfare etc., were even after 1933 always sanctioned by Dr. von Schnitzler to the same amount as previously, and he always voiced his regret whenever one of the associations was taken over by a National Socialist organization. The salute "Heil Hitler" was not customary in the office of Dr. von Schnitzler. As evidence to his attitude I would like to mention that on the occasion of a speech held by a Gau speaker in the skyscraper, which was supposed to be attended by the entire staff, Dr. von Schnitzler replied to my question as to whether I would have to attend also: "You just stay away, what do you want to listen to that nonsense for".

But I would like to put special stress on the following occurrence: In January 1940 I was arrested by the Gestapo for ^{also} correspondence kept up by my family, in my name, with persons abroad, and it was quite evident that the situation was fraught with danger for me as my attitude was generally known. Dr. von Schnitzler was at the time in Berlin, and, as I heard later on, he had given immediate directions by telephone to secure for me the best available attorney and to do everything possible in order to effect my release. Thanks is due to the attorney's endeavors, that I was released from imprisonment after three weeks. During the short time in which I recuperated from my imprisonment at home, I was cared for in a most friendly manner by Herr and Frau Schnitzler. I am indebted to Dr. von Schnitzler for the fact that I was able to regain my position in the I.G. even against the opposition of the Vertrauensrat then in power. At my return he personally conducted me to the department

- 3 -

in order to prevent any argument, an occurrence without precedent.

I also know from ^{my} activity as secretary to Dr. Carl and Geheimrat Dr. Arthur von Weizberg, whose affairs I handled in the secretariat office up to their death, that Dr. von Schnitzler not only frequented their house as a friend up to the end, but that he was -- as one of those people to whom one could turn at any time for help and advice which was always granted. Dr. von Schnitzler ^{the} rejected most emphatically National Socialist policy against the Jews and he repeatedly voiced his indignation about the different occurrences.

Due to my conversations with Dr. von Schnitzler, I was able to certify that it is absolutely impossible that Dr. von Schnitzler was in any way informed about Adolf Hitler's plans to wage aggressive wars.

I was neither a member of the Party nor of one of its formations,

signed: Helm D u b o i s

Document register No. 178/1948

The above signature of Fraulein Helm D u b o i s, residing Frankfurt/Main, Klaus Groth wasseng 16, executed before me, Attorney at Law and Notary Dr. Fritz Mertens of Frankfurt/Main, is hereby certified and attested to by me.

Frankfurt/Main, 23 February 1948

signed: Dr. Fritz Mertens

Rubber Stamp:

Dr. Fritz Mertens
Notary in Frankfurt/Main

Fee account:

Value: 3 000.— RM	
Fee Section 43, 144, 145, 26 BEO	16.— RM
Turnover tax	0.48 "
	16.48 RM

Rubber Stamp:
Dr. Fritz Mertens
Notary in Frankfurt/Main

signed: Dr. Fritz Mertens
Notary

Dr. Fried Luebbecke

Bad Homburg vor der Höhe
Schloss-Orangerie,
27 February 1948

Affidavit,

I, Dr. Fried Luebbecke, born 3 July 1883 at Wittenberge, City, retired employee, residing at Bad Homburg, Alsterpark 8, have been made aware of the fact that I make myself liable to punishment by submitting a false affidavit. I declare in lieu of oath, that my statement corresponds to the truth and that it was made in order to serve as evidence before Military Tribunal No. VI at the Palace of Justice in Ruernberg, Germany.

I have known Dr. von Schnitzler and his wife Frau Liliann, nee von Mallinckrodt, for the past 30 years and I attest to the following under oath:

I, as well as my wife, who often frequented the house of von Schnitzler during the time in question, were never members of the National Socialist Party and have never concealed our strict opposition ^{to the Party} ~~before the Schnitzlers either.~~ They knew, on the other hand, that we were on the black list at the Gauleis, that I was reportedly investigated on account of my opposition to the Party and that I for this reason was pilloried in long articles of the Party and daily press as a traitor and public enemy and that my wife, the pianist Emma Luebbecke - Jon, as a supporter of modern music, especially that of our foster-son Paul Hindemith, was excluded from any public appearance. All this did not prevent the Schnitzlers in any way from inviting us time and again, or from showing themselves in public at entertainments, concerts and theater plays with us, arms interlocked.

- 2 -

In the summer of the year 1934 the National Socialist Party started against me, as Chairman of the Society of Active Friends of the Old Town, the popular Haberfoldtreiben (popular lynch justice practiced at night by Bavarian peasants) and sent, together with the "aroused population", the riot squad, to the front of my house, for my delivery into protective custody, because I had refused to turn the Society's children's home over to the Party. We escaped an arrest by mere chance and believed we could find no safer asylum than in the home of Herr Georg von Schnitzler at Postendstrasse 41. By many telephone calls to the Police President and other dignitaries of the Party both of them endeavored to save us from this dangerous situation and, together with their cousin Frau Bekker von Rath, the widow of the renowned music critic Paul Bekker who died in exile while in New York, they helped us to get out of the city by car over the Dammis, despite the fact that all roads were blocked by the Party with SA details. I describe these city wide known events in order to describe more closely our intimate acquaintance with Herr von Schnitzler. Due to this intimacy of mine I may be permitted to state, that Herr von Schnitzler had personally no connection at all with this gangsterism which forced itself in an always increasing measure into the government of the Third Reich. Often he complained to me about this pressure to which he was subjected due to his position, once with the slogan: One thinks one is exerting pressure, but one is under pressure.

According to the disposition of his character Herr von Schnitzler is first of all a cavalier and gentleman to whom anything bordering on crime is foreign, but who on the other hand is already by birth and education forced into a position to which he, despite his absolutely moral principles, had to make concessions. The immense practical decisions of such a Kongern as the I.G. tend to be less centered in the hands of the chairman of the Vorstand of the Aufsichtsrat, as in the hands

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 151

Page 2 of original cont'd.

of the individual department head.⁸ The word coined in the 18th
Century applies especially well to Herr von Schnitzler:
The prince rules but he does not govern.

- 3 -

Herr von Schnitzler felt undoubtedly better in the act of representation than in that of the executive. His exceptionally obliging, kind nature made him far more suitable for this high representative position than for the essentially more efficient, to outsiders more modest, position of an important department chief.

From all conversations I held with Herr von Schnitzler in the first years of the Hitler regime, I always noticed a certain politically naive attitude which I tried to explain to myself as due to his non-committal character. All those matters which were most important to us, were really not so very interesting to him. For this reason I believe that I am able to state with certainty that he was not made acquainted with real dangerous decisions, due to the realization of this somewhat superficial attitude. One left to him the representation, used his well known name and exerted in the meantime without him what one probably would not have dared to do with him. Despite all of his worldliness, there was still too much of a pronounced vein of real nobility in him to give a helping hand to people who showed themselves by their deeds as criminals, or even only as enemies of peace. Just as he endeavored to maintain peace in his own large business, so was international peace to him, the cosmopolitan granddesigner, the air he needed for life. Just as people like Prince Rohan, the von Weinbergs, the Jewish Professor Georg Swarsenski, - at present manager of the Museum at Boston, - sat together with other international visitors at his table, (also after 1933), without his making a fuss about it, so it was always international culture

- 4 -

with which he felt himself allied, while war was a horror to him.

Bad Homburg, 27 February 1948

signed: Dr. Fried Laebbecke

Member of the Board of Culture

in the City of Frankfurt/Main

City Councillor of the City of Bad Homburg v.d.H.

The above signature by Herr Dr. Fried Laebbecke, residing Bad Homburg,

executed before me, Lord Mayor of the City of Homburg, Dr.

Eberlin, is hereby certified and attested by me.

Bad Homburg, 27 February 1948

signed: Dr. Eberlein

Rubber Stamp:

City

Bad Homburg v.d.H.

Holy Cross Church
Frankfurt/Main No. 14
Ketteler Allee 49
Tel 43 293

Frankfurt/Main, 22 Feb. 1948.

CERTIFICATE.

I the undersigned am a Catholic priest of the Holy Cross Community in Frankfurt/Main, Ketteler Allee 49 and I never was a member of the NSDAP. Family Georg v. Schnitzler has been known to me personally since 1930. I made their acquaintance through the family of Herr Karl v. Weinberg in the house walfried, in the chapel of which I officiated services for 4 years, and with which Herr and Frau von Schnitzler were very close friends.

At first I made the acquaintance of Frau Lily v. Schnitzler, who then because of her collaboration with the European Kulturbund was eminent in Public and European cultural life. She is and always was a cosmopolitical person. This worldwide attitude brought her also close to Catholicism and she practically stood in Catholic life for 20 years. This attitude she kept up deliberately when National Socialism came to power and the struggle against the Catholic church became more and more pronounced. Through this Frau v. Schnitzler, as she assured me, contrasted the repeatedly expressed anger of the then Gauleiter Sprenger in Frankfurt/Main, who in this church - Catholic attitude saw a deliberate affront against National Socialism. This anger was inasmuch understandable because the name v. Schnitzler was respected and esteemed in the Public life of Frankfurt and beyond. Also there was no want of open threats by the Gauleiter against the Catholic tendencies in the house of v. Schnitzler, as Frau v. Schnitzler assured me credibly.

For in 1941 the daughter of the house, Gabriele v. Schnitzler, was accepted by me into the Catholic church. In the same year she was publicly and ^{in a Catholic ceremony} married to the Duke v. Seefried of Austria at the Antonius church here in Frankfurt in the most solemn

manner. A year later her first child was christened by me in the house of the family v. Schnitzler in the presence of a large circle of relatives and friends. All these occurrences in the house v. Schnitzler were noted by the Party-authorities with greatest misgivings.

Herr v. Schnitzler as a protestant conducted himself towards this religious development in his family, in spite of the unpleasant consequences from Party quarters, with a noble and benevolent tolerance, although he knew that these things incriminated him heavily with the political rulers. During personal talks in the family circle I have personally come to know and esteem Herr v. Schnitzler as a noble thinking man. Although we also talked about political conditions, I have heard no utterance from him from which I could have inferred any spiritual relationship to National Socialism.

I can sum up my judgement with a good conscience by declaring: Family v. Schnitzler during all the past years was a home for tolerant, worldwide thinking, which mentally and spiritually stood in inner opposition to the narrow, sterile, intolerant and anti-intellectual Nazism.

Signed: G. Nilges
Priest of the Holy-Cross-Community

(Stamp:
Holy-Cross-Community
Frankfurt/Main)

I, the undersigned priest Georg Nilges, born on 6 June 1891 in Wilsenroth, residing in Frankfurt/Main, Ketteler-Allee 49, was duly warned that I make myself liable to punishment by rendering a false affidavit. I declare in lieu of oath that my statement above is true and was made to be presented in evidence before the Military Tribunal No. VI at the Palace of Justice in Nuernberg, Germany,

- 3 -

Frankfurt/Main, 28 February 1948.

Signed: G. Nilges, Priest

Document Roll No. 161 of 1948.

The above signature of the Priest Georg Nilges, Frankfurt/Main,
Ketteler Allee 49, is, herewith, certified.

Frankfurt/Main, 26 February 1948.

Signed: Dr. Peter Dochnahl

(Stamp: Dr. Peter Dochnahl
Notary Public in Frankfurt/Main)

Affidavit.

I, Heinrich Sand, born on 7 June 1882 in Bad Soden (Taunus) Spiritual Counsellor, Priest of the St. Antonius church, residing in Frankfurt/Main, Westendplatz 30, was duly warned that I make myself liable to punishment by rendering a false affidavit. I declare in lieu of oath that my statement is true and was made to be presented in evidence before the Military Tribunal No. VI at the Palace of Justice in Nuernberg, Germany.

Herr Georg von Schnitzler and his family have been well known to me since I started office as priest of the St. Antonius parish in Frankfurt/Main in 1929. Although they did not then belong to my parish as evangelic Christians (Frau von Schnitzler in the meantime became a Catholic) I soon got acquainted with the family because of their good neighborly relations to the house of our sisters, as well as on the ground of Frau von Schnitzler's interest in the Catholic church going back to the tradition of her parental home, her maiden name is Mallinckrodt. So for instance it was a custom of the evangelic family von Schnitzler, appreciated gratefully by the whole parish community, to decorate their house festively on Corpus Christi Day for the procession which led by the house of von Schnitzler's and to set up their own precious altar upon their balcony, until the procession was prohibited. A particularly brave demonstration of Christian faith was the wedding of the daughter Gabriele von Schnitzler to the Duke von Seefried in 1942, which was performed by me in my church in such solemnity as has seldom been seen in Frankfurt. Gabriele von Schnitzler had embraced the Catholic faith a short time ago. Frau

- 2 -

von Schnitzler told me at that time that Gauleiter Sprenger considered this church wedding as a political demonstration against National Socialism and reproached Herr von Schnitzler accordingly. Likewise the first child of the family von Seafried was a year later ceremoniously christened in the house of von Schnitzler. Herr von Schnitzler ^{personally arranged/} these ceremonies with me - for certain I know this in regard to the wedding - registered with me himself and took their personal and political consequences upon himself. How removed Herr von Schnitzler and his wife were from the customary considerations towards the Party can also be gathered from the fact that when my parish house was hit by a bomb for the first time in 1944, they came to me during the same night and offered to take me into their house. I accepted the offer and enjoyed their hospitality until my house was restored. During this close association with ^{Herr v. Schnitzler} I could never ^{observe} even the slightest sympathies for Nazi ideas.

I can say with firm conviction that Herr von Schnitzler in his heart was opposed to National Socialism.

Frankfurt/Main, 19 February 1948

signed: Spiritual Counsellor

S a n d

No. 53 of the Document Roll for 1948.

The above signature of Herr Spiritual Counsellor Heinrich Sand, residing in Frankfurt/Main, Westendplatz 30, executed before me, Attorney at Law and Notary Public Wolfgang Krebels, is, herewith, certified and attested by me.

Frankfurt/Main, 23 February 1948.

Signed: Wolfgang Krekels

Notary Public

Stamp: Wolfgang Krekels

Notary Public in Frankfurt/Main.

Cost: Value RM 3,000.--

6/20 Fee Section 26 RKO	RM 4.--
3 % Tax	RM .12
Total	RM 4.12

The Notary Public

Signed: Krekels

A f f i d a v i t

I, Wilhelm Fresenius, born on 25.6.1886 in Wiesbaden, minister, residing in Frankfurt on Main, Richardstrasse 45, have been duly warned that I will render myself liable to punishment if I give a false affidavit. I declare on oath that my statement represents the truth and was made for the purpose of being submitted in evidence to Military Tribunal No. VI in the Palace of Justice, Nuernberg, Germany.

I am making the following statement:

I came into contact with the von Schnitzler family when their daughter Gabriele entered my instruction classes preparatory to confirmation at Easter 1932 and was confirmed by me in St. Katharine's Church on 25.3.1934. The family took an active part in their daughter's instruction during those two years.

Then on 22.9.1934 I performed the marriage ceremony for the elder daughter Liselotte in St. Katharine's Church. Thus I also entered the von Schnitzler home itself and can say that a very Christian and humane spirit prevailed there. Our relations continued even after the confirmation of the one daughter and the marriage of the other. The von Schnitzler family joined the "Working Community of St. Katharine's Parish Inc.", the association which maintains the nurses' home and kindergarten of our parish and does the charitable work of our parish.

-2-

They still belong to this association today.

Through my fight against National Socialism -- the following was expressly stated about me in writing in a letter from the Reich Chamber of Literature of 14.3.1942: "According to my information you had to be arrested and warned by the police at the beginning of the war because you had permitted yourself remarks which were aimed against the conduct of the war. You made your hostile attitude to the National Socialist movement evident on other occasions, too, on account of which the government authorities had to concern themselves about you". -- as could be expected, I was arrested in November 1939, allegedly for the concealment of facts. At that time Dr. von Schnitzler personally acted on my behalf as soon as he returned from a trip and heard of my arrest; he consulted the Vorstand members of the I.G. Farbenindustrie, Ministerialrat Dr. Buhl and Boor-Andreas, since deceased, and Dr. Busemann of the Deutschen Gold und Silberscheideanstalt, likewise since deceased. At Dr. von Schnitzler's suggestion the four men engaged an attorney to inform the proper authorities, Gestapo, Gauleiter's office, etc., that they were very astonished at the fact of my arrest and were keenly interested in having me released from custody immediately. Since in the meantime efforts had been made on my behalf from other quarters I was released from custody before the project of Dr. von Schnitzler and his associates could be realized. Nevertheless, I am still grateful to Dr. von Schnitzler today because he acted promptly

-3-

and unhesitatingly on my behalf at that time as a matter of course, something which in view of the situation at the time was not without danger for him and the other gentlemen.

In conclusion, I might remark that my daughter Liselotte was an employee of the I.G. Farben for years and that I therefore know that no pressure along political or other lines was ever exerted by the Plant Management on the clerks and employees.

Frankfurt on Main, 20.2.1948

Stamp: Ev. Luth.St. Katharine's
Parish
Frankfurt on Main

signed: Lic. Presenius, minister
LIC. Theol.Presenius
minister

No. 165 of the Registry for 1948

The preceding signature of Minister Lic. Wilhelm Presenius, residing in Frankfurt on Main, Richardstr. 46, executed before me, Dr. Jacob Flesch, notary, is hereby certified and witnessed by me.

Frankfurt on Main, 2. February 1948

Stamp: Dr. Jacob Flesch
Notary in Frankfurt on Main

signed: Dr. Jacob Flesch
Notary.

Erich Dombrowski

Mainz, 23 February 1948
Hechtsheimer Strasse 19

A f f i d a v i t

I, Erich Dombrowski, born on 23 December 1882 in Danzig, Editor-in-Chief, residing in Mainz, Hechtsheimerstrasse 19, have been duly warned that I will render myself liable to punishment if I give a false affidavit. I declare on oath that my statement represents the truth and was made for the purpose of being submitted in evidence to Military Tribunal No. VI in the Palace of Justice, Ludwigsberg, Germany.

I have known Dr. Georg von Schnitzler for about twenty years through my work as Editor-in-Chief of the "Frankfurter Generalanzeiger" in Frankfurt am Main. During all those years I came in contact with him both professionally and socially and therefore had an opportunity to become closely acquainted with his political views and character. Not only he himself but also his wife have always shown very friendly feelings toward me and my (Jewish) wife. Nor did this attitude change shortly after the beginning of the Nazi regime when I was slandered professionally and shunned socially. Not even when I was dismissed from my position and my wife was later sent to a concentration camp. I shall always be grateful to the Schnitzlers, for their outstandingly humane behavior differed substantially from that of many other people who ostentatiously cut me, not to use a stronger expression, during the decade of my trial. This attitude was identical to that shown toward the Jewish gentlemen Karl and Artur von Weinberg whom he tried to keep on the Aufsichtsrat of the I.G. company up to the latest possible date. Jewish and half-Jewish journalists on the "Frankfurter Zeitung" also had the same experience.

-2-

When the Nazis came to power in 1933 I myself was a witness when Herr von Schnitzler expressed himself in the severest terms about the system and prophesied that it would soon go completely bankrupt, not least in a financial and economic sense. One witness of these spontaneous remarks was, among others, the Jewish gentleman Ludwig Pohl from Frankfurt on Main, who later emigrated to the U.S.A., to San Francisco, I believe. I have a particularly lively recollection of this excited conversation of Herr Schnitzler's because I discussed it thoroughly later on with Herr Pohl on our way home from the Club for Trade and Industry.

Later, on account of my retired way of life, I hardly had another opportunity to hold a conversation with Herr von Schnitzler either alone or in the presence of others. I myself, to the best of my knowledge, resigned from the club as early as 1934 out of sympathy for the Jewish members who were forced to resign from it at that time.

signed: Erich Dombrowski

Director and Editor in Chief
of the "Allgemeine Zeitung"
President of the German Press Association
in the French Zone

Reg. No. 383/1948

Herr Erich Dombrowski, Editor in Chief in Mainz, Rechts-
heimstrasse 19, who is personally known to me, has
acknowledged the signature on the preceding page before
me as executed by him. Mainz, 25 February 1948

Bill of costs:

Value of transaction not stated

Fee, par. 1 44,26 RM 4.-

Revenue tax 1,12

together RM 4.12

The Notary
signed signature

Rolando Balducci

Milan, 13 December 1947

A f f i d a v i t

Personal data: I was never a member of the Fascist party and was known everywhere for my anti-fascist views. For this reason I was under police surveillance for many years.

1.) I have known Dr. Georg von Schnitzler since 1920.
2.) After I joined the A.R.C.A. company in Milan, sole importers of the I.G. Farbenindustrie Aktiengesellschaft, in 1929 as manager I was in constant business contact with Dr. von Schnitzler.

3.) Besides our business relations I maintained close friendly relations with Dr. von Schnitzler and his family. On the basis of the numerous conversations which I had with Dr. von Schnitzler up to 1942 I can confirm that Dr. von Schnitzler always expressed himself to me in a disapproving way with respect to the National Socialist regime. The possibility of a coming war, in which Dr. von Schnitzler did not believe up to the last, was always described by him as a great misfortune for Germany and the rest of the world.

4.) In keeping with this political and moral attitude of his he made personal efforts on behalf of persons who were persecuted because of their race and took pains to secure material assistance for them in Italy.

-2-

5.) My anti-fascist views, concerning which none of my acquaintances in the I.G. Farben had any doubts, had no influence either on my personal or my business relations with I.G. Farben. During all those years I always received complete and friendly support from Dr. von Schnitzler.

6.) As Manager of the A.R.C.A. company I can further confirm that during the entire Nazi era the I.G. Farben-industrie never, as far as I know, made even an attempt to place the A.R.C.A. company at the service of National Socialist policy.

signed: Rolando Balducci

Official Certification

The preceding signature of Herr Rolando Balducci, residing in Milan, 12 Via Appiani, who is personally known to me, is hereby officially certified.

Milan, 7 January 1947 .

signed: Attilio Reimondi, Notary

Seal:

Reimondi Attilio of
Antonio Notarion

Kurt Freiherr von Lersner (16) Nieder-Erlenbach, 6 October 1947
via Vilbel, Upper Hesse

A f f i d a v i t

I, Dr. jur. Freiherr Kurt von Lersner, Nieder-Erlenbach near Vilbel, Upper Hesse, born on 12 December 1883, being aware that I should render myself liable to punishment by making a false affidavit, declare in lieu of oath that my following statements concerning Herr Georg von Schnitzler are true and are made in order to be submitted to the Military Tribunal in the Palace of Justice at Nuremberg for Case VI.

I have known Herr von Schnitzler for more than half a century since our school days at Cologne. Later on we studied for several terms together at the Bonn university. During 1919/1920 I had, in my capacity as the president of the German peace delegation of Versailles official contact with him and found him a helpful collaborator. From that time onwards we did no longer work together materially, but met each other socially for many years. On such occasions it was not difficult to find out that Schnitzler was no National Socialist, nor had been even slightly affected by national socialist ideas. For the last time I saw him in my house at Nieder Erlenbach in 1938.

I regarded Georg von Schnitzler in all those long years as a decent character

-2-

who was worthy of his particularly highly esteemed
parents.

Nieder-Erlenbach, 5 October 1947

(signed :) Freiherr Kurt von Lersner

I herewith certify the fore-going signature of
Freiherr Kurt von Lersner, Nieder-Erlenbach.

Niedererlenbach, 6 October 1947

(signed:) Heinrich von Rospatt
Attorney-at-law

A f f i d a v i t

I, the undersigned Dr. Max von Brueck, editor with the "Sueddeutsche Zeitung" in Munich, feel bound to make the following affidavit in connection with the taking of evidence in the trial against Dr. Georg von Schnitzler.

During the time between 1935 and 31 August ¹⁹⁴³ I was editor at the "Frankfurter Zeitung" at Frankfurt on the Main.

When this newspaper had been compelled to close down on the afore-mentioned day, I received an official letter from the Gauleitung Hessen-Nassau, to the effect that henceforth I should be barred from any journalistic activity because of political unreliability. The documents relating to this are at present with the IGD at Munich in the care of Mr. Isenstead.

I was repeatedly a guest in Herr von Schnitzler's house at Frankfurt and met there many pronounced opponents of Hitler. Besides, the von Schnitzler family maintained all the time connections with the circle of the Frankfurter Zeitung and the Jewish staff members of this paper. Dr. Heinz Simon, who after 1933 emigrated to the United States, was on friendly terms with the Schnitzler family. I myself never concealed towards Herr von Schnitzler my anti-fascist attitude.

After the ban to continue in my professional work I was, with my family, in a difficult financial position, as I had been cut off from my means of living. Herr von Schnitzler, however, readily used his influence on my behalf and got me a position with the I.G. Farbenindustrie although he was well aware that I had been barred from exercising my profession. I kept this position from 1 January 1944 until 31 May 1944.

(signed :) Dr. Max v. Brueck

-2-

I herewith certify the authenticity of the fore-going
signature,

(Seal) Bruckmuehl, 24 June 1947
 Municipal Administration Offenbach a.H.
 (signature)

Certified true copy!

(signed:) Dr. Fritz Hartens, Notary

(Seal) Dr. Fritz Hartens, Notary at Frankfurt on the Main.

-62-

(17b) Freiburg i. Br.,
Gruenselderstrasse 4

Die Gegenwart
A fortnightly review

The editor.

A f f i d a v i t

I, Benno Reifenberg, born on 16 July 1892 at Obercassel near Bonn, chief editor of the review "Die Gegenwart", resident at Seig-Post Witssee, Black Forest, having been warned that I should render myself liable to punishment by making a false affidavit, declare in lieu of oath that my statement is the truth and has been made in order to be submitted as an evidence to the Military Tribunal "VI in the Palace of Justice, Nuremberg, Germany.

After my dismissal from the editorship of the Frankfurter Zeitung on 1 May 1943 I was, as a half-Jew, directly endangered. Gauleiter Sprengor, when asked by my colleagues on the editorial staff to do something to prevent the SS, as they could be expected to do, from laying hands on me, namely by putting me into those special formations intended for half-Jews, had declared that he could not promise to make any exception. I had no alternative but to escape from the Gau Hessen-Nassau, where the half-Jews and the so-called People with Jewish relations (Juedisch-Versippten) were in particular danger. I found a possibility of employment in the Institute for Brain Anatomy of Professor Vogt at Neustadt in the Black Forest.

It still depended on the fact that the Prussian Ministry of the Interior, which supervised the appointment policy of the institute, approved my admission to the institute. At this moment it was ^{George} Herr Von Schnitzler who offered me his assistance. He spontaneously declared his readiness to have his name given as a reference to the Ministry of the Interior at Karlsruhe. I was very much moved by this offer. It had been made at a time,

-2-

when antisemitism, particularly in the Hessen-Nassau Gau, had assumed the most malignant form. It had been made by a man, who, in his exposed position, was continuously in danger of being suspected as "politically unreliable", and who, by his intervention on behalf of a half-Jew, had to expect injury to his person and his position.

Later on, when he heard that I had got into financial distress through my dismissal from the Frankfurter Zeitung without compensation - after an activity lasting 25 years, - he took the initiative to give me financial aid. I owe it to him, that I received out of a research funds administered by Professor Hocklein a subsidy of 6.000 RM for the scientific research work, which I then undertook in Professor Vogt's institute. By this my economic subsistence has doubtlessly been saved. I was without any means and unable to take up any paid employment (or else I should have been threatened by the Labor Office), thus, the subsidy, which I owed to Herr von Schnitzler, safeguarded my and my family's existence in a very difficult moment of my life. But it was in particular the manner in which Herr von Schnitzler came to my aid in my distress with such a calm resoluteness, that compelled my gratitude.

Chief Editor of the Fortnightly Review

DIE GEMEINSAMKEIT

(signed:) Benno Reifenberg.

The fore-going signature of Herr Benno Reifenberg, editor, resident at Seig-Post Titisee-Black Forest, executed before me, Justizrat Dr. Lohr, is herewith attested and certified.

Freiburg i.B. 8 March 1948

Bad Notariate I, Freiburg
Justizrat (signed:) Dr. Mohr
as Notary

(seal)
Badisches Notariat, Freiburg

Computation of fees
value 3000.- RM
RM 3000.- 39 4.- 31
Freiburg, 8 March 1948
The collector of fees
(signature)

A f f i d a v i t

I, Severin Boyer, resident at Frankfurt on the Main, having been warned that I should render myself liable to punishment by giving a false affidavit, declare in lieu of oath that my statement is the truth and has been made in order to be submitted as an evidence to the Military Tribunal VI in Nuremberg.

I worked in the house of Dr. Georg von Schnitzler during the time between 1 December 1935 and 25 March 1938 in the household and garden. My wife, Frau Berta Boyer, was a cook in Herr von Schnitzler's house during the time between 1928 and 1944.

Later on, I was employed as a mechanic and foreman with the firm of Alfred Teves. In 1940 I was arrested by the Gestapo because of an offense against Section 2 of the Law of 20 December 1935. Herr von Schnitzler at once intervened most energetically on my behalf and succeeded, through attorney-at-law Ledesweller, in getting me released from the Gestapo custody pending trial. It was only due to Herr von Schnitzler that my conviction was reduced from 1½ years, as had been requested, to 3 months. After having served my prison term, I owed it to Herr von Schnitzler's influence that I was not sent to a concentration camp.

This way of acting corresponded to the political attitude which I observed in Herr von Schnitzler's house during the years between 1935 and the end of the war. In view of my political attitude, it would certainly have struck me, if they had followed the national socialist line more than was unavoidable through the pressure of the Gauleitung in consideration of Herr von Schnitzler's position.

-2-

Frankfurt am Main, 21 February 1948

(signed:) Boyer Severin

The above signature, acknowledged before me and executed by
Herr Severin Boyer, resident at Frankfurt, Ruppertshainerstr. 23,
c/o Desch, in his own handwriting in my, the attorney-at-law's,
Helmut Henze, presence, is herewith attested and certified.
Frankfurt/Main, 21 February 1948

(signed:) Henze, Attorney-at-law

Evidence

I, Camilla Schenk Freifrau von Stauffenberg, nee Lady Camilla Acheson, born on the 17th September 1917, in Belsey Hill, England, wife of Hans Christoph Schenk Freiherr von Stauffenberg, living in Illfingen Kreis Saulgau, South-Wuerttemberg, am aware that I will be prosecuted if I give false evidence. I swear that what I am about to declare is true and is being made to be put before the Military Court No. VI in the Palace of Justice at Nuremberg, Germany, as evidence.

I have known Dr. Georg von Schnitzler ever since 1937 when my husband and I lived at Frankfurt on Main. The Schnitzlers often invited us to their house, where we met people of all nationalities. They did not break off with us during the war in spite of my British-birth, and asked us often to their home in Berlin.

In July 1944 I visited my husband at Oberursel, where he was an interpreter at the Prisoner of War Camp Dulag Luft. I visited the von Schnitzlers several times, who were then staying near Oberursel.

On the 20th July 1944 my husband's cousin Colonel Count Claus Schenk von Stauffenberg attempted to kill Hitler with a bomb. This attempt failed, also the planned rebellion. A great many people were arrested. All who bore the Stauffenberg name were thrown into prison, 1 ten days later, my husband on the 14th August 1944. Nazi officials held speeches which were very alarming for us on the radio. Dr. Goebbels said all blueblooded swine must be exterminated, and Dr. Goebbels spoke about the relationship of Count Stauffenberg with the British aristocracy, insinuating that he was in touch with British political circles. He can only have been referring to me, as I am the only Stauffenberg of British birth, and my uncle, Sir Alexander

-2-

Cadogan, was then Permanent Under Secretary of State. At the same time photographs of my husband and myself appeared in the British and American Press, with the heading: "This is the man who threw the bomb".

Under these circumstances it was most dangerous for any German to see us. In spite of this Dr. von Schnitzler let us know we were still welcome at his home, and we had tea with him on the 23rd July 1944, he also had the courage to show himself with us in public. After my arrest he continued to invite my husband. My husband was deeply impressed that Dr. von Schnitzler had the courage, on meeting him under escort after his arrest, in the train, to speak to him during the whole journey from Oberursel to Frankfurt. The attitude of the Schnitzlers was a welcome contrast to the attitude of some of our friends and acquaintances who thought it wiser not to have anything to do with us.

Dr. Georg von Schnitzler not only showed great moral courage during those days of terror, but his behaviour at that time also throws a favourable light on his attitude towards the resistance movement.

Ilflingen the 22nd February 1948

sgt. Camilla Schenk Frfr.v.Stauffenberg.

The above signature of Camilla Schenk-Freifrau von Stauffenberg, residing in Ilflingen, Kreis Saalgau, executed before me, Mayor Koenig of Ilflingen, is, herewith, certified and attested by me.

Ilflingen, 22 February 1948

sgt. Koenig, Mayor

Stamp:
Community Ilflingen
Kreis Saalgau
The Mayor.

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 172

Certified Copy.

Dr. Erwin Roussele
University Professor

Eschenlohe near Murnau/Upp. Bav.
House No. 97

Affidavit.

During my present stay in Frankfurt/Main I hear that Dr. Georg von Schnitzler, Member of the Centralvorstand of the IG Farbenindustrie A.G., has been held in custody for 7 months pending trial. Therefore, I consider myself bound in honor to do my share towards clearing up the matter by submitting the following statement to the American authorities:

- I. In a decade of National-Socialist rule Herr Georg von Schnitzler never uttered one word of solidarity with National-Socialists, on the contrary many a one of wise ^{scepticism} and pessimism. He emphasized always his intellectual and moral aloofness in regard to the more and more increasing dictatorship. About the war, he once said to me in 1943: "In the course of the world's history one generally was afraid of starting wars and had enough sense of responsibility also towards one's own people to break off hopeless wars at once. The strange thing about this crazy war is that Germany continues this war, although it was decided long ago, yes, already in the very beginning."
- II. In the circle of friends of the house of von Schnitzler I found no National-Socialist, rather many of its opponents. I mention only Professor Beutler, the painter Max Beckmann, the Journalists Raiffenberg and Hausenstein, the writer Fried Luebbecke, and the number of Jewish friends of the house, as the two families Weinberg, the Merton family, etc.. The intercourse with these was kept up in a spirit of loyal friendship notwithstanding all the difficulties the Gauleiter made for Herr and

- 2 -

Frau v. Schnitzler on that account.

III. When I myself, as a high ranking freemason, first lost my professorship at the university in the first war semester, and later on also the chairmanship of the China Institute, in 1942, after hard struggles with the Gauleiter, I and my family (my wife and 3 children) were menaced by the danger of financial chaos. Frau v. Schnitzler, in her capacity as member of the Vorstand of the China Institute, thereupon caused her husband to intervene. Herr Georg v. Schnitzler then prevailed upon the Centralvorstand of IG Farben in a plenary session to pay me a rent by way of a subvention of RM 500.- a month, with the stipulation of my continued collaboration in the scientific periodical "Sinica", payment to be effected through the China Institute. This he did well knowing that hereby he and IG Farben publicly took sides against the Gauleiter and thus openly condemned his action of ousting me from my position.

I submit the above deposition as an affidavit.

Frankfurt/Main, 28 November 1945

signed: Erwin Rousselle.

Doc. Ref. No. 200-47

The above signature, personally executed by the University Professor Dr. Erwin Rousselle, residing at Eschenlohe near Murnau/Upper Bavaria, House No. 97, is herewith officially certified.

Frankfurt/Main, 14 April 1947

signed: Dr. Fritz Mertens
Notary

Seal

Costs

Value: 3 000.- RM	
Fee Sec. 144, 26, 39, RKO	4.- RM
Turnover Tax	- 12 "
Se.	4.12 RM

The above copy, being in literal agreement with the submitted original, is hereby officially certified.

Frankfurt/Main, 8 May 1947

signed: Dr. Mertens
Notary

Seal: Dr. Fritz Mertens
Notary in Frankfurt/Main

Affidavit.

I, the undersigned Austrian Envoy Extraordinary and Plenipotentiary Minister (retired), born in Vienna on 9 January 1889, depose and say the following in lieu of oath:

On 15 May 1943, I was "provisionally" discharged from the KZ Buchenwald near Weimar with "Heimatverbot" (injunction against returning to my home country), after having spent more than 5 years in the concentration camps Dachau and Buchenwald in "protective custody" for "political" reasons. The compulsory banishment forced me to look for a position in pre-Anschluss Germany. I applied, therefore, among others to the friend ^{of} my youth, Herr Richard von S e i l v i n g e r, who had been employed in a high position with IG Farbenindustrie AG in Frankfurt/Main for many years. The latter conveyed to me at once the invitation of the head of the Auslandsabteilung (Foreign Department) of the IG, Herr Georg von S c h n i t z l e r, to see him for the purpose of getting a position with IG Farbenindustrie AG in Frankfurt/Main.

Herr von Schnitzler received me in the middle of June 1943 in Frankfurt, Main, in the most cordial manner and gave me comprehensive counsel. From this lengthy conversation in the home of Herr von Schnitzler I gained the definite conception that Herr von Schnitzler not only did not at all mind my "political objectionability" as a provisionally discharged KZ inmate, but that he also condemned without reservation the trespasses of the National-Socialist regime. Due exclusively to his benevolent and appropriate consultations and recommendations I was, within the shortest time, employed with the Berlin Central Office of IG Farbenindustrie AG, to wit the national economy department.

- 3 -

I am ready at any time to swear to this deposition.

Vienna, I., Schauflogasse 2-IV, 5 May 1947

signed: Theodor Hornbostel.

Envoy Extraordinary (Ret.)

The above copy, being in verbatim agreement with the
submitted document, is herewith officially certified.

Frankfurt/Main, 6 November 1947

signed: Dr. Fritz Mertens
Notary

Seal: Dr. Fritz Mertens,
Notary in Frankfurt/Main

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 174

Georg Heck

Frankfurt/Main, 1 April 1947

Artist,

Kehreinstrasse 32.

Affidavit.

I feel the necessity to repay an old obligation of gratitude, as far as it is possible to me, to Dr. von Schnitzler, of whose surprising arrest I have learned.

I am one of the artists who were designated as degenerate by the Hitler regime. After 1933, my existence was greatly endangered and difficult. Dr. von Schnitzler attempted, in 1935, to give me considerable assistance by placing a large commission with me. He commissioned me with the execution of a large mural in a dining hall on the second floor of the IG Farben casino in the IG skyscraper, Frankfurt/Main. Due to his recommendation the order was financed from the cultural fund of the firm. The painting depicted a bucolic scene in a classical landscape, illustrating a stanza of Holderlin's about contemplativeness, i.e. tranquillity after work.

Herr von Schnitzler displayed considerable courage in selecting my person as the painter, and in taking sides with this then tabooed "modern painting". I have always appreciated that very highly, along with the social sympathy and humane benevolence of Herr von Schnitzler. I wish to depose this in the hope of thereby contributing to an understanding of his

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 174

- 2 -

attitude and personality. I declare this in lieu of oath,

signed: Georg Heck

Document Register No. 165/47

The above signature of the artist Georg Heck, residing in
Frankfurt/Main, Kohrenstrasse 33, executed by his own hand before
me, is herewith officially certified.

Frankfurt/Main, 1 April 1947

signed: Dr. Fritz Mertens
Notary

Rubber Stamp: Dr. Fritz Mertens
Notary in Frankfurt/Main

Costs account:

Value 3 000.-- RM

Fee Sec. 144, 26, 39 RKO	4.-- RM
Fee Sec. RKO	RM
Fee Sec. RKO	RM
Clerical Fee Sec. 136, 152 RKO	RM
Postal Fee Sec. 136, 152 RKO	RM
Turnover Tax	1234
Total:	4.12 RM

signed: Dr. Mertens
Notary

Rubber
Stamp:

Dr. Fritz Mertens
Notary in Frankfurt/Main

DOCUMENT BOOK IX SCHNITZLER
DOCUMENT No. 175

C e r t i f i e d C o p y

Auguste Brunnabend

Frankfurt/Main, 1 December 1946
Klusberstrasse 12

Upon my return from the Concentration Camp at Theresienstadt I learned that Dr. Georg von S c h n i t z l e r, member of the Zentralvorstand of IG Farbenindustrie AG, has been under arrest for many months.

I consider it therefore my absolute duty to inform the American authorities of the following facts:

Herr von Schnitzler found it in no way objectionable - although I am a 100 % Jewess - to associate in my house, and that from 1937 up to my removal to Theresienstadt in January 1944. I can testify with a clear conscience that Herr von Schnitzler did not, in any way whatever, show even a trace of sympathy towards National-Socialism, on the contrary he opposed it on political as well as on moral grounds. He considered the measures of the government against the Jews as outside of every humane sentiment. As I know, he had aided, by word and deed, amongst his colleagues within the circle of employees of IG Farben (Herr von Weinberg), as well as in the circle of his friends and acquaintances, those persons who were being persecuted for racial reasons, not shying back at sacrifice. Thereby, he had incurred the criticism and attention of Party offices and particularly that of Gauleiter Spranger.

While I was at Theresienstadt, Herr von Schnitzler most devotedly took a fatherly and most generous interest in the well-being of my child (my daughter Erna).

- 2 -

especially since her fiance (Freiherr von Solow, Hamburg) was not in Frankfurt. My child told me that Herr von Schnitzler was as ^{as} ~~anxiously~~ expecting the Americans/^{us} ourselves, all the more so, since Herr von Schnitzler in the past had been in continuous danger because of the above mentioned reasons.

Herr von Schnitzler, of course, would never mention the matters stated above, which is my reason for taking the liberty of bringing some of them to your knowledge.

I submit the material of this deposition in lieu of oath.

signed: Auguste Brunnabend

neo Dahlberg

Document Register No. 95/47

The above signature of the housewife Auguste Brunnabend, neo Dahlberg, residing in Frankfurt/Main, Klueberstrasse 12, executed before me in her own hand is, herewith officially certified.

Frankfurt/Main, 11 March 1947

signed: Dr. Fritz Mertens
Notary

Seal

The above copy is hereby officially certified to be in literal agreement with the submitted original.

Frankfurt/Main, 11 March 1947

signed: Dr. Fritz Mertens
Notary

Rubber Stamp:

Dr. Fritz Mertens
Notary in Frankfurt/Main

Affidavit.

I, Idselotte Mueller - Cunradi, born 12 May 1925 at Ludwigshafen/Rhine, residing at Lindenfels/Odenwald, Obergasse, have been made aware of the fact that I make myself liable to punishment by submitting a false affidavit. I declare in lieu of oath that my statement corresponds to the truth and that it was made in order to serve as testimony before the Military Tribunal No. VI at the Palace of Justice in Nurnberg, Germany.

I am the daughter of the Director (in name only) of the I.G. Farbenindustrie A.G., Dr. Mueller-Cunradi, who died in the year 1945. My father was an employee of the I.G. Farbenindustrie A.G. since 1920, and since 1933 was entrusted with the management of the Oppau plant. Since the death of my mother and brother I lived together with my father constantly, and there was a very close confidential relationship between my father and myself. We frequently discussed the military and political situation of Germany, and I know from these talks that my father - as most of the gentlemen of the I.G. can probably confirm - was an absolute opponent of the Nazi regime. But of the gassing of human beings at Auschwitz my father never made any mention at all to me. However, later on he occasionally spoke about sorry conditions in the Concentration Camps, among those also at Auschwitz. But he stressed the fact that

- 2 -

everything was tried by the I.G. to ease the lot of the inmates as much as possible in so far as they were working in the I.G. plant at Auschwitz. My father spoke to me of gasings at Auschwitz not even as a rumor, and I am sure that, due to the mentioned close relations between us, he would have spoken to me about this if he had known anything about it.

I consider any statements according to which my father is supposed to have spoken about gasings, and any participation whatsoever in this by the I.G., as impossible according to my most sincere conviction.

Lindenfels/Odenwald, 19 March 1948.

signed: Liselotte Mueller-
Guradi

The above signature by Fraulein Liselotte Mueller-Guradi, residing at Lindenfels/Odenwald, Obergasse, executed before me, is hereby certified and attested by me.

Lindenfels, 19 March 1948.

The Mayor

As Deputy: Goels

rubberstamp: Hess, Mayor

Lindenfels

S t a t e m e n t

I, Dr. Hans Kugler, Frankfurt/Main, Ulmenstrasse 10, - born 4 December 1900 - submit the following statement representing to my best knowledge and belief my knowledge about the person of

Herr Dr. Georg Schnitzler

and especially his actions in the sense of international collaboration.

On 20 June 1921 I joined the staff of the Farbwerke, formerly Meister Lucius & Bruening, at Hoechst/Main, one of the predecessor firms of the I.G. Farbenindustrie A.G. In December of the same year I was transferred to the I.G. - and the Contract Department, which acted as Directorate secretarial office and where all the more important business transactions and decisions within the sphere of color sales of the then German Aniline-Dye plant combine converged. In this department, to which after the amalgamation the "Central Office for International Dye Agreements" was joined, and whose name after the transfer to Frankfurt in 1930 was changed into "Farben Management Department," I was a staff member up to the spring of the year 1945 without a break. From 1928 on I was in charge of it as procurist, and from 1934 on as Director.

At the time I joined the Hoechst Farbwerke, Dr. v. S. was member of this firm's Vorstand and manager of the Hoechst dye sales. In the same year he became chairman of the "Business Commission" of the Interessengemeinschaft of the then German Aniline Dye plants, the committee in charge of all basic decisions on the sector of dye sales of the predecessor firms of the I.G.. This was replaced after the amalgamation by the "Farben Ausschuss" (Dye Committee) whose chairmanship was held by Dr. v. S. since approximately 1927. I was invited to the conferences of the "Business Commission" during the course of the year 1922 already, where I kept the minutes of the meeting. From the end of 1920 I also attended regularly the conferences of the "Farben Ausschuss" (Dye Committee) and was member of the Committee. Due to these activities I was practically participating in all international negotiations taking place on the dye sector since 1924.

I make these advance statements in order to demonstrate that I was in close contact with Dr. v. S. . . . for close to 25 years, and that this statement results from an intimate knowledge of events on the sector of international dye stuff chemistry, as well as of the personality and work of Dr. v. S. . . . especially on this sector.

I. The position of Dr. v. S. . . . in the international dye industry.

In 1921 Dr. v. S. . . . took over the chairmanship in the "Business Commission", and since then he had had a dominating influence on the business policy of the I.G.'s, predecessor firms in the dye sector, and on the formation of their relations to the dye industry abroad. The German dye industry's position after the close of the first World War and its position in relation to foreign countries were outlined by me in detail in two papers for the U.S. Control Office I.G. Farben, Frankfurt/Main, entitled:

"The production of coal-tar dyestuffs in Germany and in the world under special consideration of the situation of the I.G. after the end of war"

dated 31 December 1945 (Volume I)
31 January 1946 (Volume II)

and

"Activities of I.G. Farbenindustrie A.G. in the Dyestuffs Industry"

dated 30 March 1946 - 15 June 1946

(the last mentioned date refers to the copy made by Military Government)

In the middle of the 1920's the Aniline Dyestuff industry of the world was undergoing a crisis, due to the fact that as a result of the first World War international output had been doubled, if viewed in round figures, but that world demand had remained just about stationary. The alternative solution offering itself at that time to the participating groups of producers in the different countries, may in short be brought to the norm: "Fight to the End" or "International Agreement and Cooperation".

To take the first mentioned course would most definitely not have been without good prospects for the German Dye Industry. A large home market, together with the high technical standard and scientific research, would very probably have enabled the German Dye Industry to survive such a fight of all against all. It is in a large measure due to the personal attitude of Dr. W. S. . . . which aimed at international co-operation, that in those years a course of international agreement was taken. Important way-stations on this course were:

- 1924 Convention with the Swiss Dye Industry on the sector of certain wool dyes
- 1925 Convention with the Swiss Dye Industry on the sector of certain special dyes for the dyeing of cotton and paper etc.
- 1927 Provisional agreement with the French Dye Industry
- 1929 Change of the German-French agreement into a final contract for the duration of 40 years. At the same time conclusion of a German-Swiss contract of the same duration as well as the conclusion of a contract likewise of 40 years duration, the so-called Tri-Partite-Cartel, regulating the entire production of the German Swiss and French Dye Industry.
- 1931 Agreement between the Tri-Partite-Cartel and the Italian Dye Industry
- 1932 Conclusion of the so-called Quadri-Partite-Cartel, a contract of the Tri-Partite-Cartel with the chief representative of the British Dye Industry, the Imperial Chemical Industries Ltd. London
- 1934 Conclusion of an agreement between the Czechoslovak Dye Industry and the Tri-Partite-Cartel as well as an agreement between the Tri-Partite-Cartel and the Polish Dye Industry, which had been preceded by a provisional agreement in 1932.

Aside from these basic agreements, a whole number of special agreements were concluded during the course of years up to the start of the second World War, in which sometimes the I.G. as such, sometimes the Tri-Partite resp. . . . the Quadri-Partite Cartel, acted as partners.

- 4 -

So agreements were in existence for certain territories and certain dye stuff groups with the Dye Industries of the United States and Japan.

By reason of its business volume and its technical and scientific standing, the I.G. had the leadership to a great extent in this combination, and its representative was Dr. v. Sauer. To bring about a so far reaching work of agreements represents a business accomplishment as well as personal merit. To maintain and direct the business relations with partners of different nationalities, different capacity of production and with, as is easily conceivable, often deviating interests, over years and decades within the framework of such a contract agreement would have imposed large demands even under normal business conditions. Experience teaches first of all in connection with such contracts, that the more important partner - and that was in this case the I.G. with a share of about 70 % in the Tri-Partite-Cartel and about 65 % in the Quadri-Partite-Cartel, - is often tactically the weaker party, and the partner who has to make most sacrifices in the case of compromise solutions. But these different agreements actually did not function under normal economic conditions, quite aside from the political situation beginning in 1933. They were rather from the beginning of the thirties on influenced by the crisis in world economy, and the changes caused by it on the sector of international currency exchange. Particularly the Tri-Partite and the Quadri-Partite-Cartel were shaken in their foundations, for the accounting of these agreements was based on the gold standard and thus on the existence of stable exchange conditions. The difficulties arising out of this situation in regard to the functioning of the different agreements are described in detail in my above mentioned papers written for the U.S. Control Office. Within the framework of this statement I restrict myself to the following conclusions: If the agreements survived this crisis and were still operative at the beginning of the war,

then this is due first of all to Dr. v. S. He consistently followed the road which the German Dye Industry had taken under his initiative at the beginning of the 1920s despite the changed economic conditions. It is due to his talent in negotiating, his ability to make himself acquainted with the mentality and interests of the other partners, his willingness to make generous compromises, and last but not least also to the esteem and trust which was conceded to his fairness and loyalty, if time and again solutions could be found which safeguarded the continued validity of the agreements.

Scope and importance of this object becomes evident if one bears in mind that the German dye export before this war amounted to 10 % of the net foreign exchange income of the entire German commercial export. Consolidation of a so important part in German economy within the framework of long term international agreements constitutes a part of international history of economics, which is inseparably tied up with the name of Dr. v. S.

Below I shall list the names of a few consequential personalities of the international dye industries, who could be questioned regarding the events from the beginning of the 1920's up to the outbreak of war, regarding the share Dr. v. S. had in them, and in regard to an evaluation of his personality:

England: Sir Harry Mac Gowan c/ of Imperial Chemical Industries Ltd. London

G.J. Cronshaw c/of Imperial Chemical Industries Ltd. London.

France: R.P. Duchemin } c/of Compagnie Nationale de Matières
J. Frossard } Colorantes et Manufactures de Produits
L. Frossard } Chimiques du Nord rhénans - établissements Kuhlmann, Paris

G. Thesmar } c/of Soc. An. des Matières Colorantes
& Produits Chimiques de Saint-Denis,
Paris.

Switzerland:

- 6 -

G. Koechlin

c/o J.R. Geigy, A.G., Basel

U.S.A.:

Lamotte-Dumont

c/o E.I. DuPont de Nemours & Co.,
Wilmington

Orlando Weber)

B.A. Ludwig)

c/o National Aniline & Chemical
Co., Inc., New York

The function and significance of the international agreements in the dyestuffs field have at times been explained as follows:

That the agreements were concluded on the part of the Germans with the intention of keeping down the industrial potential of other countries in this field of the organic chemical industry and that one of the dominant ideas in reconstruction of the German dye industry after the First World War and its consolidation by international agreements had been to further subsequent disputes by Germany in the field of power politics.

Both explanations are false. Anybody who is familiar with conditions in the international dye industry knows that its development in the middle of the twenties was ^{heading towards} complete disaster as a result of the discrepancy in the existing outputs, that the choice, as already emphasized above, was only that of a struggle until the less efficient producers succumbed and the outputs inflated after the First World War were in this way eliminated or else an agreement with voluntary limitations, and limitations of German industry itself. It was neither the German intention to secure a monopolistic domination of the market nor did the agreements lead to monopolistic tendencies in practice. What we intended to achieve, and what was achieved, was to eliminate a state of depression along with its foreseeable consequences.

And the second explanation likewise neglects the true state of affairs. If there was any industry in Germany which had every reason to hope that no new military developments would arise it was the German dye industry. The German dye industry had again worked up to a leading position in the world after 1918 and consolidated this through a long-term regulation of the market. It had everything to lose and nothing to gain from new military complications. Nothing could arise that would be worse for the maintenance of what had been achieved and for the results of 20 years of reconstruction work than a new war. Dr. v. S. in particular possessed this clear and sober knowledge, and from many conversations I know that he feared that the foreign policy of the Third Reich could lead to military complications. When I sought out Dr. v. S. in his office on the morning of 1 September 1939 he gave me his hand, deeply shaken, with the words: "The work of a lifetime is now collapsing. How is one ever to build up again what is now falling in ruins!"

At the apex of the military successes of the Third Reich - at the end of 1940, beginning of 1941 - when the I.G. was asked by German government authorities for its opinion regarding the reorganization of the European chemical industry the I.G. adopted the viewpoint that it was impossible and absurd to try to force back the economic developments of the last twenty years and reestablish the position which Germany held in the dye field before the First World War. What had happened since 1918 should be accepted as an unalterable factor. In which connection, however, it was important to make an effort to prevent misdirections of men and capital, such as had occurred after the First World War, in Europe especially. In accordance with this basic attitude the I.G., in an agreement with the Czech dye industry of March 1941 as well as in the reorganization of its relationship to the French dye industry in November 1941, guaranteed both partners a volume of business equal to the status quo of the prewar period. This is not the action of one

- 8 -

whose own country is at the height of its military successes, who was willing to pay the price of war for the opportunity to expand its own economic positions.

II. Dr. v. S.'s functions in other international organisations and his work in the interests of international understanding.

His inclination by nature toward international cooperation is also reflected in his various memberships in international associations. Thus, Dr. v. S. was

Member of the Franco-German Association

Chairman of the Interstate Belgian-German Committee

Member of the German-Spanish Association

Vice President of the German-Italian Foundation for Studies.

He was also

Vice President in the Court of Arbitration of the International Chamber of Commerce

and

Member of the Presiding Board of the German Group of the International Chamber of Commerce.

In 1929 v. S. was German Commissioner General for the World Exhibition in Barcelona and represented Germany at that time, which was exhibiting examples of ten years of peaceful reconstruction work.

In British industrial circles Dr. v. S. is well known outside of the field of dye chemistry, especially as a participant in the Anglo-German industrial conferences in the beginning of 1939. These negotiations coincided with the time of the German entry into Prague and remained without any positive result. They were one of the last attempts to lessen or bridge over the political tensions, existing at the time, through private business negotiations and arrangements and thus to save the peace.

III. Summary.

I shall summarize my opinion of his character and his activity as follows:

- 1) Dr. v. S. worked for about twenty years for international cooperation in the industrial field. International understanding in the dye-stuffs field is, so to say, his life work. This cooperation rebounded as much to Germany's profit as to the advantage of his foreign partners and over and above that it proved to be in the interests of regulating world economic relations.
- 2) The consistent observance of such a policy of international cooperation is in keeping with his entire character as a man. He regarded himself as the representative of German interests, but more than this as a European and citizen of the world. Such an attitude is rooted in the breadth of his intellectual interests and in his intimate relations with cultural events on this side of the border and beyond.
- 3) Dr. v. S. is a man who seeks to adjust diverging interests by means of "give and take" and compromise. At times readier to compromise than his colleagues or partners were willing to consider opportune. Disinclined to fighting, not out of lack of courage, but from the conviction that in the long run more can be achieved ^{by} forbearance, compromise and arguments of reason and justice than by playing up real or supposed positions of power. As a result of this intellectual attitude tempted at times to proceed along paths which appeared for the moment to offer the least resistance.
- 4) Anything but a "National Socialist". Among friends and confidantes full of criticisms of the reprehensible phenomena of the Third Reich. Ready to help out at home and abroad when these phenomena brought men into danger and distress or

exposed material or intellectual interests to oppression. During the first years after 1933 impressed by the idea, like so many Germans -- many of whom are no longer willing to admit it today -- that all criticism by bystanders was useless and that the National Socialist revolution, with all of its evil manifestations and accompanying circumstances, could only be diverted into an "evolution" if criticism came from the Party instead of being directed at the Party. Motivated by such ideas in joining the SA and the Party. This idea proved to be wrong in its practical possibilities and his disillusionment about this was no less great than that about his unfulfilled hopes that the rest of the world would call the bluff of the Third Reich's foreign policy at a time when the worst could still be prevented.

- 5) For almost 25 years I was a very close assistant of his in the field of dyestuffs. The hierarchy, division of authority and administrative structure of the I.G. necessarily limit my judgment in business matters to this part of the firm's field of activity. My knowledge of his work in the sphere of responsibility of the Vorstand and other bodies is only cursory. However, I would assume that an objective appraisal would show that his actions, attitude and conduct in this field, too, coincided with the above opinion of Dr. von Schnitzler as a man and as an industrialist.

Frankfurt on Main, 26 March 1948.

(Dr. Hans Eugler)

27.3. Signature notarized by

Dr. Fritz Martens, Frankfurt on Main.

Document Book 9 Schnitzler

CERTIFICATE OF TRANSLATION

21 April 1948

We, Joseph Goesser, Fred Salomon, Adolph Lusthaus, John B. Robinson, Robert Hoffmann and Hanns Ed. Gleichman hereby certify that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of the Document Book 9 Schnitzler.

Hanns Ed. Gleichman
A-443029

Adolph Lusthaus
B 398010

Robert Hoffmann
20162

John B. Robinson
K-046350

Joseph E. Goesser
B 397993

Fred Salomon
A-446622

-91a-
" E n d "

Defense
Case 6.

I N D E X

to
Document Book X

Supplement to Volumes III - V: Francolor

for

Dr. Georg von SCHNITZLER

Documents 187 - 192, Pages 1 - 101

<u>Schnitzler</u>	<u>Edi.</u>	<u>Description of Document</u>	<u>Page</u>
<u>No.</u>	<u>No.</u>		

Ref: Francolor

178		"The Burdens of the Chemical Industry, The Broken Contract with France." Report by Geheimrat Duisberg on the Annulment of the Gallus Contract by Kuhlmann.	1-3
179		Dr. James Rabinfeld: "The Development of the French Dye- stuffs Industry" from: "Frankfurter Zeitung" of 26 October 1924: "5525 tons of German Dyestuffs seized by French troops in May 1923, Re- striction of Imports following Stabili- zation of the Reichsmark, Annulment by Etablissements Kuhlmann of the Agreement concluded between the I.G. and the Compagnie Nationale on the transfer of production secrets and the fixing of marketing areas.	4-10
180		Franco-German Cartel Agreement of 27 April 1929, with Appendix 1, namely the Franco-German Supplementary Provi- sion of 15 November 1927 and Appendix 2, namely the Cartel agreements of the con- tracting parties with the Swiss I.G.	11-37
181		Contract dated 26 February 1932 between the Kontinentales Farbstoffkartell and the Imperial Chemical Industries Limited, London.	38-48

- I -



Georg

Schnitzler No.	Exh. No.	Description of Document	Page
182		Contract dated 19 December 1934, between the Boruta and the Wola (Polish Group) on the one side and the I.G., the United French Dyestuffs Factories including the Polish factory Mianica and the three Swiss dyestuffs factories including the Polish dyestuffs factory Pabianice (Tripartite Group) on the other side.	49-61
183		Affidavit by <u>Alfred Hoffmann</u> , Oberregierungsrat in the Reich Ministry of Economics, Chemistry Department (Chemie-Referat). On the occasion of a conference on the proposed foundation of the Francolor, Schnitzler stated that "he considered it imperative that the French Industry be correctly and fairly treated, without any exertion of pressure whatsoever as, after the cessation of hostilities, it would again be essential for the industries of France and Germany to work on a basis of collaboration which it would be possible to establish only on a foundation of voluntary co-operation."	62-63
184		Affidavit by <u>Dr. Elmar Michel</u> , Chief of Military Administration and Chief of the Economics Department of the Administrative Staff of the Military Commander-in-Chief for France, on the subject of Francolor negotiations.	64-74
185		Letter dated 30 December 1941 from L. Frossard, Paris to Director Genl., I.G. Thanks for support given by the I.G.	75-77
212		Affidavit by <u>Frau Lilly von Schnitzler</u> on her visit to Paris at the beginning of 1944 and her conversation with Frossard and Thesmar on the Francolor Agreement.	78-80
186		Affidavit by <u>Dr. Hans Kuntze</u> on the character and individual attitudes of Bernard, Ruchaux, Bicholonne and Bouthillier, the members of the French Government who took part in the negotiations preceding the conclusion of the Francolor Contract.	81-84

Schnitzler No.	Exhibit No.	Description of Document	Page
187		Affidavit by <u>Dr. Erich Berndt</u> : The admission of foreigners to the Aufsichtsrat of a German Aktiengesellschaft was prohibited by official decree.	85-86
188		Affidavit by <u>Hermann Walter</u> , Auditor (Wirtschaftsprüfer): Calculation of the value of the plants provided for FRANCOLOR by the French dyestuffs factories, taking amortisation into account. The result is 320 million francs instead of the 800 million francs allowed by the I.G. in the Francolor Contract.	87-89
189		Questionnaire sent to <u>Carl Koechlin</u> , Director of the Swiss Dyestuffs factory I.G. Geigy A.G., Basel. The questionnaire was sent through the Secretary General; no reply has as yet been received.	90-94
190		Letters dated 4 November 1943 from the Reich Chamber of Industry to the Reich Minister of Economics, Berlin on the liquidation of enemy property with copy to the Reich Commissioner for the Management of Enemy Property: "For the reasons stated above, the leading and most influential concerns within the margins of private enterprise in Germany have therefore no intention, at a time when Germany is fighting for her very existence, of ensuring for themselves the advantage in the struggle for superiority in private enterprise both German and international, by engaging in a race for the property of enemy- owned private enterprises.	95-99
191		Affidavit by Attorney-at-Law and Notary Public <u>Fritz Ludwig</u> , Berlin, former Legal Adviser to the Bata- Konzern: <u>Geholrat Schmitz</u> , acting for the I.G., rejected an offer from the Czech firm of Bata A.G. for the purchase of the latter firm.	100-102
192		Affidavit by Attorney-at-Law <u>Friedrich Silleker</u> on the refusal of the I.G. to purchase the Czech Bata-Konzern, despite the economic importance of the Konzern and the chemical interests bound up in it.	103-104
213		Affidavit by <u>Walter Ludwig</u> on the purchase of the oxygen works in Alsace Lorraine.	105-106

Schmitzler No. 178

Exhibit No.

I, Dr. Walter Siemers, Attorney-at-Law at Hamburg, at present
Defense Counsel at the American Military Tribunal in Nuernberg,
herewith state that the attached document

"The debts of the Chemical Industry,

The broken agreement with France."

is a literal copy of a photostat copy of this article which was
sent to Herr von Schmitzler on 1 October 1924 by an acquaintance
(according to the handwritten note on the photostat copy) and
which was taken from the private files of Schmitzler.

Nuernberg, 24 April 1948

signed: Dr. Siemers

Excerpt from:

THE DEBTS OF THE CHEMICAL INDUSTRY.

The broken agreement with France.

The organization at the top of the German chemical industry, the "Association for the preservation of the interests of the chemical industry of Germany" held its main meeting of this year on 17 September at Kissingen. A large number of delegates came from all parts of the Reich. The chairman, Professor Dr. Duisberg, opened the meeting and pointed out that whereas last year's meeting was a purely business meeting, owing to the economic battle of the Ruhr, this year the association had dared to meet again in the traditional way. He described the present economic situation as extremely bad. The persons responsible for the Versailles Treaty now harvest the fruit of their uneconomic way of dealing and thinking. But at least the basis for any healthy economy, the currency, was settled as if by a miracle. The speaker then dealt in detail with the far too heavy burdens of the Dawes Plan and the London Pact and in particular with their application to the chemical industry. He complained bitterly that the German chemical industry had been sacrificed in London in favor of the immediate evacuation of the Dortmund district, by extending the undertakings to deliver dyestuffs and pharmaceutical products, which expired on 10 January 1925, by $3\frac{1}{2}$ years, i.e. until 15 August 1928.

Geheimrat Duisberg then reported in detail on the agreement which the German dyestuffs industry had concluded three years ago with its rival, the French dyestuffs factory "Compagnie Nationale". From the beginning the agreement had worked to the satisfaction of both parties, as it was based on a policy of common sense and good faith. Only during the fight over the Ruhr had it been interrupted by mutual agreement.

When the firm of Kuhlmann at Lille acquired the shares of the Compagnie Nationale which the firm had taken up, the representatives of the administrative council (Verwaltungsrat) of this firm tore up the agreement as if it had been a scrap of paper, on a very weak pretext and with the victor's arrogance of a Poincaré. The inability on the part of Germany to get recognition at the Peace Court for an agreement which was incontestable from a juridical point of view, was used by the others to exact favorable conditions. When we refused because it touched our very existence, this agreement, which was to bring about peace among the belligerents also in the economic field, was torn up. As the French were afraid that we would not deliver to them the dyestuffs necessary for their textile industry after 10 January 1925, they demanded an extension of the term of delivery. Unfortunately, our representatives in London agreed to this extension to the detriment of the German dyestuffs industry, although they were well acquainted with the situation.

In another respect too the chemical industry was treated in Paris and London worse than other fields of industry. According to estimates which it is possible to make in this field it has been determined that the 8 % of 5000 millions = 400 millions, with which it is proposed to burden the chemical industry, has been set too high by 20 to 25 %.

I, Dr. Walter S i e m e r s , Attorney-at-Law in
Hamburg, at present Defense Counsel at the American Military
Tribunal in Nuremberg, certify herewith that the attached
article:

"The Development of the French Dyestuffs Industry"

by Dr. James Rubinfeld, Berlin

is a true copy from the "Frankfurter Zeitung" No.802,
of 26 October 1924.

Nuremberg, 24 April 1948

(Dr. Siemers)

Excerpt from:

"Frankfurter Zeitung" No.802 of 26 October 1924:

"The Development of the French Dyestuff Industry"

by Dr. James Robinfeld, Berlin.

The decision to extend deliveries of German dyestuffs and colors of another $3\frac{1}{2}$ years (beginning 1 January 1925), taken at the London conference at the insistence of France, has proven anew that the much advertised independence of the various national industries has not yet made much progress, but that they make use of every available means to exert pressure (in this case, through the liberation of Dortmund) in order to obtain for themselves a necessary period for development at the expense of others. This is the explanation for the excessively high customs duty (ad valorem and weight) on dyestuffs imports into the United States, the regulations for the issue of licenses in England, or the German reparations of up to one fourth of our current production. The consumers in France and in other countries are informed monthly of the amount of this production by the Reparations Commission. Since the center of resistance to the cancellation of the German undertakings to make these deliveries is in France, a survey of the total picture of the French dyestuff industry, which really only came into being in 1917, is here indicated.

On 31 January 1917 the Compagnie Nationale des Matières Colorantes et des Produits Chimiques, with a business capital of 40 billion francs, was founded with the help of the Government who were motivated by defense considerations. Until the end of the war, the raw materials and intermediates which were needed by the company, were mostly supplied by America, since the only company in the country which existed at that time and which produced these products, the Société Anonyme des Matières Colorantes et Produits Chimiques, was itself dependent on German and British

supplies, and later on produced them only in insufficient quantities. The branches of the German factories, i.e. of Leopold Cassella & Co., and of Agfa in Lyons, of the Badische Anilin & Sodafabrik in Neuville-sur-Saône, of Bayer-Leverkusen and Teiler-ter-Meer near Lille, of the Hoechst Farbwerken in Creil, did the final processing only in France, since the protection afforded by the French patent laws, as well as the high custom duties on finished products, made the import of primary products profitable. The result was, that at the outbreak of the war there were no German factories worth mentioning for these products in France. The position was very much the same with the two branches of Swiss factories in St. Fons and Maronnas near Rouen. In 1917/18, Clemenceau appealed to the American government, with the result that the kindred industry in the United States, which at that time was already producing on a considerable scale, shipped the necessary quantities of primary products across the ocean. After the war, the Société Alsacienne de Produits Chimiques was founded, with a business capital of 16 million Francs, in order to take over the German factories in Thann-Muehlhausen. At the end of 1919 there were as many as 8 French dyestuff concerns, producing approximately 150 tons of dyes a month. In addition, there was the production of the Swiss branch factories.

Altogether the total production capacity of the country at that time could have covered at most one half of the actual demand. The production of primary materials, however, continued to be inadequate for a long time, and in the case of benzene even at the end of 1920 did not amount to more than approximately 10,000 tons a year, against approximately 17,000 tons as at present. Nevertheless, there were signs that progress was being made, inasmuch as before the war at least 90% of the dyestuffs requirements had to be imported from abroad, mostly from Germany. Today it is open to doubt as to whether the enormous deliveries

of reparations dyes, under Section VIII, Appendix VII of the Treaty of Versailles, might not have contributed to holding back the French dyestuff industry, which had already begun to develop. Even as important a person as Mr. Seydoux would now have liked to call a halt to these forced deliveries, to allow this development to continue. The French government sought to assist the young industry by making the law of 7 November 1919, governing the import of German dyes and chemicals into France. This law provided for an advisory committee which was to assist the Minister of Finance (Office des Produits Chimiques et Pharmaceutiques) and which dealt with each case separately when deciding as to the free import. At the same time a special distributing agency was created for the dyes supplied as reparations, namely the Union des Producteurs et des Consommateurs pour le Développement de l'Industrie de Matières Colorantes en France, whose business capital amounted to 2 million Francs, in which the producers and consumers participated to the extent of 50% each. In accordance with its statutes the "Union" might not distribute any dividends, but only pay 6% interest on the capital invested, since its sole purpose was to further the development of the French dyestuff industry. For this, the "Union" was to receive a yearly subvention from the French state, granted in the form of commissions. An equalisation committee (similar to that in England) would see to it that German dyes were imported only if a French company could not deliver them in the same quantity and quality.

When in May 1923 French troops "requisitioned" 5525 tons of German dyestuffs, they were careful to take as booty high quality products, which could not be produced in France itself

in anything like the quantities to cover the requirements. Most of the alizarine dyestuffs were finally taken over in January of this year by the British Alizarine Co., Ltd. When in August and September of last year the German dyestuffs prices were computed in goldmarks and the allies, also under the stipulations of the Peace Treaty on minimum prices, found that they were forced to pay more for the reparations dyestuffs than before, the French producers took advantage of this situation to put additional pressure on the government to throttle still further the import of German dyestuffs. Since that time there has been a falling off in the deliveries of German dyestuffs to France as reparations which are becoming more and more restricted to fat soluble colors and other high quality products. The agreements concluded about 3 years ago between the German I.G. and the Compagnie Nationale concerning the exchange of manufacturing secrets and the splitting up of markets according to territories, were annulled for the same reasons and under meaningless pretexts, by the Etablissements Kuhlmann, which had taken over the said company. For reasons of State policy, the French courts maintain an entirely passive attitude towards this breach of contract. The Compagnie Nationale has now in France the same semi-official status as for instance the British Dyestuffs Corporation in England, although the participation of the French State does not take the form of capital. Its capital of 40 million francs was increased in 1919 to 71, in 1921 to 100 millions. When it was merged with Kuhlmann, i.e. at the end of 1921, it was marketing 600 different types of colors (at the present time there are more than 1000), sufficient to satisfy the whole of the country's requirements in numerous fields of application. The combine now possesses a capital of 150 million francs and the very old established firm of Kuhlmann produces in its 19 factories an enormous variety of chemicals,

while the Compagnie Nationale produces in its factories in Oissel and in Villiers Saint-Paul, synthetic indigo; alizarine, basic, acid, and direct dyestuffs; hydrosulphite and a series of intermediates. It speaks for the productivity of the Compagnie Nationale that, in the case of indigo and derivatives, for example, in 1922 only 1% of the requirements had to be imported, and last year considerably less. Exact figures are available for 1922. According to these, the total production of the country amounted to: 1710,5 tons of sulphur dyestuffs, while imports amounted to 78,4 tons. In the case of azo dyestuffs, the home production figures are still more favorable: 3574,8 as against 905,7 tons; for indigo and indigo derivatives: 1394,6 as against 12,3 tons. In contrast to this, France has to import the whole of her requirements in fat soluble colors (vat dyes), in the same way as she continues to be dependent on outside supplies for the easily soluble and high quality dyestuffs. The production of sulphur dyestuffs has in every case been doubled during the last years. According to a report by the American commercial attaché in Paris, the volume comprising all kinds of dyes produced and imported amounted to: (in kilos)

	Production	Imports		Production	Imports
1919	2 316 388	2 574 000	1922	7 481 347	1 797 000
1920	6 517 401	5 588 300	1923	9 708 34	515 200
1921	5 288 016	1 148 200			

The entire situation is the reverse of what it was before the war when 90% of the requirements had to be imported. Today 90% is produced in the country itself by the above mentioned concern, together with the Société Alsacienne, the above mentioned Société Anonyme des Matières Colorantes (24 million Francs capital) the Société Chimique de Lat Pavoise, the Compagnie Française des Produits Chimiques et Matières Colorantes (10 million Francs), Labboux et Camell, the Société Anonyme Durand et Huguenin, Etablissements Steiner Père

et Fils and Laroche et Juillard, who are all members of the Union Syndicale des Fabricants de Matières Colorantes. Of the ^{i.e.} production shown for 1922, approximately 10,000 kg., 40% is accounted for by the easily produced azo-dyestuffs, 24% by indigo and its derivatives, 20% by sulphur dyestuffs and the rest by alizarine, indophenol, oxazine, thiazine and similar products. As regards the more important vat dyes, efforts to produce have so far shown only poor results.

Schmitzler Doc. No. 180

Exhibit No.

I, Dr. Walter SIEMERS, Attorney-at Hamburg, at present Defense Counsel before the American Military Court at Muernberg, hereby confirm that the attached document:

German-French Cartel Agreement

of 27 April 1929

is a true and correct copy of the Agreement taken from the I.G. Files in Frankfurt/M.

Muernberg, 24 April 1948.

(Dr. Siemers)

German-French Cartel Agreement

The following Agreement is concluded between the I.G. Farbenindustrie
Aktiengesellschaft, Frankfurt a.M.,
hereinafter called "I.G."

and the following French firms forming a Cooperation Association:

Compagnie Nationale de Matieres Colorantes et Manufactures de
Produits Chimiques du Nord reunies, Etablissements Kuhlmann, Paris,

Societe Anonyme des Matieres Colorantes & Produits
Chimiques de Saint-Denis, Paris,

Compagnie Francaise de Produits Chimiques et Matieres
Colorantes de Saint-Clair du Rhone, Paris,

Societe des Produits Chimiques et Matieres Colorantes de
Mulhouse, Paris,

Etablissements Steiner, Vernon,

Durand & Huguenin, S.A., Alencon,

Societe Anonyme pour l'Industrie Chimique, Mulhouse-Dornach,

hereinafter called "C.M.C.",

Par. 1 General

On 15 November 1927 a provisional agreement was made between the
Contracting Parties concerning the ^{quota accountancy} / of production on the basis
of the turnover values (Appendix I). Following on this provisional
agreement, a further Cartel Agreement was concluded between the
Contracting Parties and the Swiss dyestuffs factories associated
in a community-of-interests agreement.

- hereinafter called the Swiss "I.G." - also attached hereto as Appendix II.

The Contracting Parties are agreed that, should this new Agreement which is concluded simultaneously with the Swiss I.G. and which in future governs the cartel relations between the Contracting Parties, for any reason become null and void, or become impossible of execution, the existing cartel relationship in the form in which it has developed on the basis of the provisional agreement and the later supplements, including the provisions both territorial and material hereto relevant in the Agreement with the Swiss I.G., shall continue to exist. Furthermore, the Contracting Parties agree with immediate effect to the following:

Par. 2 Technical Support

The Contracting Parties contemplate for the future a closer technical co-operation. This is planned to take place in such manner place that they will on request/processes and experience at the disposal of each other, wherever it lies in the general economic interests of the participants. They will come to an understanding on each case as it arises and will in friendly agreement determine the conditions - particularly the compensation to be paid. Products which, to a relatively considerable extent, are also used outside of the dyestuffs factories, as well as the products which are manufactured according to the high pressure process, shall however in principle remain outside of the agreement.

Par. 3 Business Administration and Seat of the Cartel.

The business of the Cartel will be conducted by the Business Management. This is the actual organ of that Cartel and it is responsible for all decisions within the framework of the Agreement. It will in particular watch over the loyal carrying out of the stipulations, establish the Cartel installations which appear to it to be necessary for the carrying out of the Agreement and determine the sales and cartel policy. It will be responsible for a proper price and credit policy and will take care that the right spirit prevails and that work proceeds harmoniously. All orders issued by it within the framework of the Agreement shall be followed.

The Business Administration consists of :

- 1) The Business Management,
- 2) The Advisory Council.

The Business Management on the part of the German I.G. is composed of the following gentlemen:

Dr. G. v. Schnitzler,
G. Molnar,
Prof. E. Selck,
Comm.-Rat Weibel,
Dr. Krokeler,
Prof. Kurt H. Mayer,

and on the part of the C.M.C. of the following gentlemen:

J. Frossard,
G. Thesmar,
J. de Kap-harr,
A. Roessler (Herr A. Rhein as deputy).

The Advisory Council on the other hand consists, on the part of the German I.G., of the following gentlemen:

Geheimrat Prof. C. Esch,
Dr. C. von Weinsberg,
Geheimrat Dr. n. Schnitz,

and, on the part of the C.M.C., of the following gentlemen:

R.-F. Duchesnin (Herr J. Frossard as deputy)

Dr. P. Bloch (Herr G. Thesmar as deputy)
i.e. to say,
/three members from the German I.G. and two members from the
C.M.C.

Normally, the management of the Cartel business will be conducted by the Business Management. Decisions can only be made by the Business Management if both Contracting Parties agree. Should a decision fail to be brought about on account of lack of agreement, each Contracting Party may, within two weeks, require that the matter be laid before the Advisory Council, which - so far as it is not a matter for the Arbitration Board - shall give the final decision.

Should the Advisory Council, whose members each have one vote, fail to reach a unanimous decision, it shall be strengthened by the addition of two impartial business persons of important standing, who shall likewise each have one vote. These two business persons, who need not necessarily be Dutch, shall be appointed in each case as it arises by the Chamber of Commerce (or its corresponding institution) in Amsterdam. The Advisory Council thus strengthened shall decide by majority vote.

It is agreed that deputies entitled to vote shall be appointed both for the members of the Business Management and for those of the Advisory Council. The members of the Advisory Council can mutually represent each other within their own Contracting Party, as can likewise the members of the Business Management. A member of the Business Management can at the same time be a member of the Advisory Council. Should the objects of negotiation require it, further persons may on occasion be co-opted for the meetings of the Business Management.

Standing rules shall be drawn up for the procedure of the Business Management, which shall be Appendix III to this Agreement.

Amsterdam, which is also the seat of the German-Swiss Cartel, is selected as the seat of the Cartel. The Contracting Parties will make this their domicile for the discharge of all obligations arising out of the Agreement. In order to exclude the possibility of any disputes concerning which law is to be applicable, they expressly stipulate that Dutch law shall be exclusively decisive for the entire Agreement relationship. The Contracting Parties will establish a Cartel agency in Amsterdam which will have the duty of dealing with all formal matters arising out of the Cartel. In particular, it shall be incumbent upon this agency to make all preparations for the procedures concerned and further to institute and carry out all such measures as are concerned with the appointment of the Board of Arbitration and the execution of its decisions. The administration of the securities deposited and the taking of any necessary action connected therewith, in particular with the realisation of pledges, are also its concern. The expenses of the Cartel agency shall be borne by the Contracting Parties in proportion to their quota.

So long as the joint Cartel agreement with the Swiss I.G. exists, the organs laid down in this three-party-Agreement for the regulation of the joint Cartel relations of the Contracting Parties shall be decisive; this logically applies also to the Board of Arbitration (Par. 5), in so far as it does not involve questions that concern only the internal relations of the German I.G. and the C.M.C.

Par. 7 Duration and Termination of the Agreement.

The Agreement begins on 1 January 1929 and ends on 31 December 1968. Should none of the Contracting Parties give notice of termination at least five years before expiry, the Agreement will continue without further procedure on each occasion for a further ten years.

The Contracting Parties are agreed that this Agreement, having so long a period of duration, must more than ever be operated on the principle of good faith; in this connection it is the unanimous will that, in view of the deep interference in the business organizations which this Agreement involves, its continuance must above all things be placed beyond question. Should therefore unforeseen difficulties of an important nature actually arise in one or other territorial or material sphere, it shall be incumbent upon the Contracting Parties to exert all efforts to remove these difficulties, and if they are not able to agree, the Board of Arbitration shall decide, under due consideration of this point of view and in accordance with the object of the Agreement.

The Contracting Parties are also further in agreement that the present Agreement is not dependent on the existence or non-existence of the arrangements prevailing between the individual firms of the C.M.C., in particular of the community-of-interests agreement or other agreements existing between them at the present time. The firms composing the C.M.C. or their legal successors are on the contrary at all times jointly and severally responsible for the fulfilling of the Agreement also by the other firms of their own group. This applies especially to the penalties under the Agreement.

The individual Contracting Parties shall in each case see that the required organs of the Cartel are established and that each Contracting Party has always available a uniform agency for the conduct of Cartel business.

This Agreement is executed in eight copies; one copy is executed for each firm. The German and the French text have the same validity.

Basle, 27 April 1939.

Compagnie Nationale de Matieres Colorantes et Manufactures
de Produits Chimiques du Nord reunies, Etablissements Kuhlmann

signed: J. Froeseard

Societe Anonyme des Matieres Colorantes & Produits Chimiques de St.-Denis

signed: G. Thesmer

Compagnie Francaise de Produits Chimiques et Matieres Colorantes de
St.-Clair de Rhone

signed: J. Froeseard

Societe des Produits Chimiques & Matieres Colorantes de Mulhouse

signed: G. Thesmer

Etablissements Steiner

signed: J. de Kap-Herr

Durand & Huguenin S.A., Huningue

signed: J. de Kap-Herr

Societe Anonyme pour l'Industrie Chimique

signed: A. Roseler

I.G. Farbenindustrie Aktiengesellschaft

signed: v. Schnitzler signed: Salck

- Annex I : German-French Provisional Agreement of 15 November 1927.
Annex II : Cartel Agreement of the Contracting Parties with the Swiss I.G.
Annex III: Rules for Conducting the Business of the Management.
Annex IV : Arbitration Rules.
Annex V : Regulations for the Realization of Securities.

* * * * *

Annex I

German-French Provisional Agreement of 15 November 1927.

The following agreement was concluded to-day, subject to the approval of the supervisory Boards of both parties, between the C.I.F., represented by

Messrs. Joseph Frossard
Georges Thomer
Jacques de Lap-Herr

in the name of the following factories:

Etablissements Kuhlmann, P.O., Paris,

Société Anonyme de Matières Colorantes et Produits Chimiques de St. Denis, Paris,

Compagnie Française de Produits Chimiques et Matières de St. Clair du Rhone, Paris,

Société de Produits Chimiques et de Matières Colorantes, Mulhouse, Steiner, Vernon,

Durand & Huguenin, Mulhouse,

S... pour l'Industrie Chimique, Mulhouse-Dornach,

on the one hand,

and the I.G. Farbenindustrie Aktiengesellschaft, represented by its Vorstand on the other hand.

As a result of the discussion which took place between the leading officials of the French and German chemical

industries, both parties unanimously agreed that a collaboration in the three large fields of the utilization of dyes, nitrogen and coal, whereby the parties would be rightly bound together to form a financial whole, appeared desirable, to achieve production and sales efficiency, limitation of all costs and cheapening of production.

The prerequisites for such a merger, i.e. the linking together of the numerous interested parties and places of production in the individual fields are not yet sufficiently far advanced on the French side to permit the immediate realization of this plan.

Only in the field of dyes and dyeing auxiliaries have the interested parties in France concluded a union, which would make it appear possible to reach a provisional agreement in this field.

On the strength of these considerations the following agreement is concluded, to be incorporated later with the overall agreement. This agreement takes effect immediately. Its existence is subject to an understanding being arrived at for the whole field of the chemical industries of both countries. In this connection it is understood that such understanding must be arrived at within two years at the latest of the coming into force of this agreement.

1) Production.

The production will be distributed between the two parties according to a ratio to be arrived at on the basis of the turnovers in terms of value and quantities for the period from 1 July 1924 to 30 June 1927.

The distribution was based on the proceeds from sales realised by both parties during the test period, and arrived at according to the same view points.

In consideration of the depression of gold values at home, caused by inflation and by competition of the French firms among themselves, the French Group will receive for dyestuffs a quota of 11,5%, instead of a quota of 9,8% which it should receive according to strict accountancy methods. This being so, the quota of the I.G. amounts to 68,5%.

As regards dyeing auxiliaries, a ratio will be fixed as soon as both parties are absolutely clear that the quantities mutually exchanged are arrived at according to the same premises.

Both parties are entitled to produce goods, the sales values of which correspond to the above mentioned percentages of the total results obtained by the cartel. It is understood in this respect that these results must in all cases be arrived at for a calendar year according to the same principles as those applied to the turn-overs of the years on which the ratio is based. 1928 is considered the first calendar year.

To enable the quotas to be applied a production schedule will be set up for each calendar year. Any switching of production arising from the fact that one of the parties for reasons of economy refrains from manufacturing certain products being produced at present, will be compensated by additional allocations in other production items. Stocks must be taken into consideration only insofar as it is established

as it is established that one of the parties carried excessive stocks at the beginning of the cartel. These would have to be decreased and placed against the production of the party concerned.

At the end of each year it will be ascertained by comparing the total production of both parties, whether and to what extent one of the parties has produced too much or too little. The yardstick in this case is not the actual cost of the merchandise, but the total yield of the cartel for the quantities sold in the settlement period. The party which exceeded its production quota must accept goods for the quantity in excess. In principle this should be done as from the one country of production to the other country of production. When making the adjustment, special attention should be given to the economic consideration that only such products must be transferred from one country to the other as supplement in a suitable way the assortment of products of the other party. The choice of the products to be furnished to affect the adjustment lies in principle with the party which fell short of its quota. It is understood between the parties, however, that they will arrive at a friendly arrangement concerning the products to be selected. They should be calculated at the average selling price of the cartel for the products concerned ^{during} the settlement period in question, deducting 15% for the saving of selling costs.

The average sales price must be calculated on a gold basis, and in the same way as the proceeds were established for the aforementioned period. Payment must be effected in gold dollars.

2. S a l e s

The cartel undertakes to secure for itself, by constantly perfecting its sales organisation and by suitably fixing its

business
prices, the highest possible share of the dycstuffs/of the world.
It will be guided by the principle that consumption must be
promoted in every direction, and everything avoided which could be
interpreted as monopolistic tendencies to favor the producer
unilaterally. 40

Each side must supply its home market in the first place; the
distribution of any excess production still remaining to those
countries which are foreign to both parties must be made by
excluding any internal competition. On the basis of the figures
of the aforementioned period, the I.G. and the C.I.F. have
arrived at the following agreement for handling the question of
the various markets:

a) France -

The French market, including the French colonies and
protectorates (according to specified list), shall in the
main be supplied by the U.I.F., it being understood, how-
ever, that I. G. shall have the right to import those products
not yet produced in France or not produced in sufficient quan-
tities, or whose manufacture has been stopped by reason of the
arrangements under 1) "Production". The sale of the I.G. and
C.I.F. products must be on a uniform basis as far as feasible.

As regards the rest of the world, this will be split up
according to various groups of countries:

- 1) C.I.F. will refrain from supplying those countries which
were not supplied by it previously to 1 July 1927, as also from
supplying a number of other countries in accordance with the
undermentioned list, concerning which a final decision must be
taken.

- 2) In another group of countries it is intended that the I.G. sales organisations shall take over the sales for the C.I.F. under the C.I.F. trade marks.
- 3) In a third group of countries the agencies of both groups will sell independently side by side. It is understood that sales will be effected by both agencies maintaining close contact with each other, observing the principle that existing business connections must be respected, and that any kind of underselling must be excluded. The I.G. has submitted to the C.I.F. a list of suggestions for dealing with countries under 1), 2) and 3). The C.I.F. will examine the suggestions. The final splitting^{up} of the countries will be effected as quickly as possible.
- 4) The C.I.F. will refrain from having its own agency for Mexico. It will, however, continue to do business with the Paris buyers of Mexican firms.
- 5) Spain: An attempt will be made to bring about an understanding between F.N.C.E. and Bilbao. When this is achieved, the French production program will be transferred to F.N.C.A. and the total sales to the Anonima Bluch.
- 6) Russia: The C.I.F. will continue to do business with Russia directly through the official Russian purchasing agencies, excluding all business done through middlemen. It will act in closest contact with the I.G.
- 7) Poland: As far as Poland is concerned, the C.I.F. has certain obligations towards

Zgiers, the extent of which cannot be established before 1 January 1928. The question will then be dealt with anew.

3) Cartel Council (Kartellrat).

The management of the cartel business is in the hands of the Cartel Council. This consists of eight members, five of which are delegates of the I.G. and three are member delegates of the C.I.F. The composition of the Cartel Council at the time of the signing of the contract is as follows:

I.G.: Dr. Kreckeler,
Prof. Dr. Meyer,
Herr Molnar,
Dr. von Schnitzler,
Herr Naibel.

C.I.F.: Will appoint its delegates later.

The chairmanship will be taken by the I.G.

The Cartel Council will deal with all questions connected with the execution of this contract. One of its first tasks will be to establish every year a production program for the following year according to the principles laid down in Paragraph 1) "Production", and in the course of a given production period to make alterations to the program for this period.

It must also make decisions on all questions arising out of the sales agreements, and in particular see to it that the business is conducted according to the arrangements for those countries where the I.G. and the C.I.F. sell separately, or through a common representation. In particular, the Cartel Council will keep a watch on the trend of sales prices in the various markets and will decide on joint measures concerning prices. Likewise, in

conjunction with the Dyes Departments (coloristischen Abteilungen) it must see that prices are equalized and adjusted, in order to avoid any internal competition between the two contracting parties. If the Cartel Council cannot reach agreement, the point in question shall be submitted to the Chairman of the Vorstand of the I.G. and to the person who is at the time Chairman of the C.I.F. in order to reach a common decision.

Two committees will be formed to deal with all commercial questions, one for France, on which the C.I.F. will be represented by three, and the I.G. by two members, viz.

Director Molnar,
Director Dr. von Schnitzler,

and one for the rest of the world, on which the I.G. will be represented by three members:

Director Molnar,
Director Dr. von Schnitzler,
Director Waibel,

and the C.I.F. by two members.

Also for these Committees the C.I.F. will ^{representatives} nominate its / later. It has been definitely agreed that deputies may serve on these two committees.

Frankfurt/Main, 15 November 1927.

I.G. Farbenindustrie Aktiengesellschaft

signed: v. Schnitzler signed: G. Molnar

signed: I. Frossard
signed: G. Thomsen
signed: J. de Kap-Herr.

Enclosure II

Cartel Agreement of the Contracting Parties with the Swiss I.G.

The firms mentioned below:

- 1) I.G. Farbenindustrie Aktiengesellschaft, Frankfurt/Main
hereinafter called "German I.G.",
- 2) the Basle Dyestuff Factories merged with the I.G. comprising:
Gesellschaft fuer chemische Industrie in Basle, Basle,
Chemische Fabrik vorm. Sandoz, Basle,
J.R. Geigy, A.G., Basle,
hereinafter called "Swiss I.G.",

and

- 3) the French firms joined in collaboration:

Compagnie Nationale de Matieres Colorantes et Manufactures
de Produits Chimiques du Nord reunies, Etablissements Kuhl-
mann, Paris,

Societe Anonyme des Matieres Colorantes & Produits Chimiques
de Saint-Denis, Paris,

Compagnie Francaise de Produits Chimiques et Matieres
Colorantes de Saint-Clair-du-Rhone, Paris,

Societe des Produits Chimiques et Matieres Colorantes de
Mulhouse, Paris,

Etablissements Steiner, Vernon,

Durand & Huguenin, S.A., Binningio,

Societe Anonyme pour l'Industrie Chimique, Mulhouse-Dornach,

hereinafter called the "C.M.C.",

herewith conclude the following agreement.

The necessity for closer cooperation between the dyestuffs factories most active in the market had already been apparent for quite a long time in the sphere of dyestuffs and auxiliary dyestuffs products.

From this necessity there emerged provisional agreements between the C.M.C. and the Swiss I.G., and between the German I.G. and C.M.C.; the latter was incorporated in the actual contract.

Moreover, contracts have now been made for the same purpose between the German I.G. and the Swiss I.G. and between the C.M.C. and the Swiss I.G.

The contracts between the German I.G. on the one hand and C.M.C. on the other, between the German I.G. on the one hand and the Swiss I.G. on the other and between C.M.C. on the one hand and the Swiss I.G. on the other will be maintained in principle and are also not to be altered by a possible failure of the present contract or vice versa the failure of the German-Swiss, the Franco-German or the Franco-Swiss contracts does not affect the present contract. In so far as the present contract contains supplements or modifications of the existing contract, its regulations are to take precedence over those of the German-Swiss, Franco-German and Franco-Swiss for the duration of its validity.

Para. 1 Scope of the Agreement.

The agreement concerns dyestuffs and dyestuff auxiliaries, the latter only in so far as a special agreement exists containing quotas and compensation.

Para. 2 Territory covered by the Agreement.

The agreement includes all the countries of the world with the exception of the United States of North America (U.S.A.). Nevertheless, sales to the U.S.A. or export from the U.S.A. fall under this agreement.

Para. 3 Personal sphere of validity of contract.

The agreement extends not only to the signatories of this contract and their legal successors, but also to all the production and distribution agencies for dyestuffs and dyestuff auxiliaries managed or supervised by them now or in the future. At the moment of signing the contract, these include in particular: for the German I.G.

DURAND & HUGUENIN A.G., Basel,

Societa Chimica Lombarda A.E. BIANCHI & Co., Rho,

Fabricacion Nacional de Colorantes y Explosivos, Barcelona,

Societa Electro-Chimica de Flix, Flix,

(the latter from the period from 1 July 1934 to 31 December 1935)

for the Swiss I.G.:

The Clayton Aniline Co. Ltd., Clayton-Manchester,

Pobianico A.G. fuer Chem. Industrie, Pöbmannico,

Societa Borghesca per l'Industria Chimica, Milan,

Produits CHLOY S.A., Binningue,

for C.M.C.:

Centrale des Matieres Colorantes, Paris.

Para. Quotas, rationing and distribution of sales.

a) In order to ensure extension of sales for each contracting party with relation to their previous market, the share of each party according to quota in the total turnover of the cartel will be established on the basis of the principles laid down in

Appendix I

"Implementation regulations for the ascertainment of quotas and for the execution of the distribution".

b) The parties to the contract agree to see to it that their businesses develop by direct retail methods on the basis of the quotas shown from the above calculation, to the exclusion of reciprocal direct or indirect competition. Accordingly, the cartel management must work towards the automatic preservation of the quota situation.

c) Constant supervision of the turnover and the course of the business in the individual market, will provide the necessary data for the assessment, which will then enable the management to take appropriate measures. In principle, therefore, the status quo in the reciprocal supply relations which has come into existence in the individual countries should be maintained. Similarly the businesses are to be run as before in principle in the dyestuff groups already on the market.

d) The contracting parties undertake

to maintain their technical equipment which contributes to the manufacture of the products in the contract, in the scope and condition demanded by the transaction covered in the contract.

e) The principles relating to sales distribution which have developed between the German I.G. and C.M.C., should also be maintained in the relationship between the three contracting parties. In particular, even in the future, C.M.C. will not deal with the following countries as marketer:

Germany
Switzerland
German Austria
Sweden
Norway
Denmark
Finland
Lithuania
Latvia
Estonia
Poland
Mesopotamia
Tripoli
Turkey in Asia
Siam
Australia
furthermore all other countries in which C.M.C.
can show no deliveries in the reference period
of the Franco-German contract.

f) In so far as the handling of the French market is concerned, including the French colonies and Protectorates, the applicable directives are laid down in Appendix II. These work on the basic principle that French production is to be disposed of to the greatest possible extent in the French home market, including the French colonies and protectorates. (Appendix III)

g) Through the Franco-German agreement C.M.C. is entitled to produce goods to a sales value corresponding to its quota as laid down therein. The

Swiss I.G. Assents to this production guarantee for dyestuffs granted to C.M.C. by the German I.G. At the end of each business year it will be ascertained whether and to what extent C.M.C. can be considered to be over or under-producing. A provisional interim check-up should be made quarterly. As between C.M.C. and the German-Swiss group, whichever party has exceeded its quota takes over the corresponding quantity in goods from the party whose deliveries have fallen below the given level, and this will be done in principle from one production country to the other. Excess of, or failure to fill the quotas as between the German and the Swiss I.G. will be dealt with in accordance with the principles laid down in the German-Swiss contract.

h) The choice of the goods to be delivered to make up the balance is in general left to the sub-quota deliverer, but it is understood that friendly agreement can be reached between contracting parties as to the products to be selected and that it will be taken into reasonable consideration if the sub-quota deliverer has lagged behind in individual dyestuffs groups in relation to their share in his total turnover in the reference period. This delivery takes place free of charges above cost, including packing.

The purchase price stipulated in Appendix I is reduced by 20% for all sales expenses saved by the sub-quota deliverer as well as for costs of packing, dispatch, insurance etc, arising for the party taking over and other costs affecting the net result including rebates, compensation, discount and any other allowances.

Payment will be made on a U.S. Dollar basis.

i) In accordance with the principle governing both the German-French and the German Swiss agreement, the last sale, free border, debited to the consumer is the basis of calculation for the evaluation of the turnover. Deliveries effected between the Contracting Parties, or, within the Contracting Parties, from one contracting firm to another contracting firm (e.g., Ciba and Sandoz), or between a contracting party and the companies carried on or controlled by it or by another contracting party, or between these companies, are thus excluded from calculation in the computation of the Cartel turnover figures.

j) The turnover figures of the production and marketing agencies carried on or controlled by the Contracting Parties shall be included with their full turnover volume in the quota calculation from the time the control becomes effective, irrespective of the amount of the quotas due to the Contracting Parties.

k) Allocation of quotas in the business in dyestuffs auxiliaries shall, in accordance with par. 1, only take place exceptionally.

..... Par. 2. Business Administration and Seat of the Cartel.

a) The business of the Cartel shall be conducted by the Business Administration. This shall be the real organ of the Cartel and shall be responsible for all decisions within the framework of the Agreement. It shall, in particular, watch over the loyal execution of the stipulations, establish such cartel installations as appear to it to be necessary for the carrying out of the Agreement and determine the sales and cartel policy. It shall be responsible for a correct price and credit policy and ensure that the right spirit prevails everywhere and that the work proceeds harmoniously.

All regulations issued by it within the framework of the contract shall be followed,

b) The Business Administration shall be composed of:

1) The Business Management,

to which the German I.G. and the Swiss I.G. shall each appoint 3 members,

and the C.M.C. delegates 2 members,

2) the Advisory Council,

to which the German I.G. shall appoint 5 members

the Swiss I.G.	"	"	3	"
and the C.M.C.	"	"	2	"

c) Normally, the business of the Cartel will be conducted by the Business Management. Decisions can only be made by the Business Management if the three Contracting Parties are in agreement. Should a decision not be affected on account of non-agreement, each Contracting Party may, within the period of two weeks, require that the matter be submitted to the Advisory Council, whose decision - in so far as it is not a matter for the Board of Arbitration - shall be final.

In the Advisory Council, every member has one vote.

d) Should the Advisory Council not reach an unanimous decision, it shall be strengthened by the addition of two unbiased business persons of important standing, who shall each have four votes. These two business persons, who need not necessarily be Dutchmen, shall be designated as the case arises by the Chamber of Commerce (or the body corresponding thereto) in Amsterdam. The Advisory Council thus constituted shall decide according to majority vote.

.....

.....

Par. 10 Duration and Termination of the Agreement.

The Agreement shall come into force on 1 January 1929 and end on 31 December 1960.

Should notice of termination be given by any of the Contracting Parties at least five years before the expiry of the Agreement, it shall on each occasion be valid for a further period of 10 years.

The Contracting Parties are agreed that this Agreement, having such a long period of duration, must more than ever be dominated by the principle of good faith; it is therefore the unanimous will that, in view of the profound interferences in the different business organizations which the Agreement involves, its duration must above all things be placed beyond question. Should unforeseen difficulties of an important nature actually arise, therefore, in one or other of the territorial or external fields, or the German-Swiss or German-French Agreement become null and void, it shall be incumbent upon the Contracting Parties to exert all efforts to remove the difficulties and, if they should not be able to agree, the Arbitration Board shall decide, with due consideration of this point of view, and in accordance with the object of the Agreement.

It is further understood between the Contracting Parties that the present Agreement is not dependent on the existence or non-existence of any Agreements, particularly of any community-of-interests or other agreements existing at the present time between the individual firms of the Schweizer I.G. and those of the C.M.C. The firms composing the Schweizer I.G. and the C.M.C. shall on the contrary be at all times ^{severally/} responsible jointly and/or the fulfilment of the Agreement, even by the other firms of their own group. This applies in particular with respect to the penalties under the Agreement.

The individual Contracting Parties shall in every case take care that the necessary organs of the Cartel are duly appointed and that each Contracting Party shall always have available a uniform agency for the conduct of the Cartel business.

This agreement shall be executed in eleven copies; one copy shall be issued to each firm. A French text of the agreement shall be executed; the German and the French texts shall have the same validity.
Basle, 27 April 1929.

Gesellschaft fuer Chemische Industrie
in Basel

(Sd) Brodbeck (Sd) G.Engl

Compagnie Nationale de
Matières Colorantes et Manu-
factures de Produits Chimiques
du Nord réunies
Etablissements Kuhlmann

(Sd) J. Frossard

Chemische Fabrik vorm. Sandoz

(Sd) Stauffacher

Société Anonyme de Matières
Colorantes & Produits Chimiques
de Saint-Denis

(Sd) G. Thesmar

J.R. Geigy A.G.

(Sd) A. Mylius (Sd) C. Koechlin

Compagnie Française de Pro-
duits Chimiques et Matières
Colorantes de Saint-Clair-
du-Rhône

(Sd) J. Frossard

Société des Produits Chimiques
et Matières Colorantes de
Mulhouse

(Sd) G. Thesmar

Etablissements Steiner

(Sd) J. de Kap Herr

Durand & Huguenin S.A., Haringue

(Sd) J. de Kap Herr

Document Schnitzler No. 180

Exhibit No.

Societe Anonyme pour l'Industrie
Chimique

(Sd) A. Roesler

I.G. Farbenindustrie Aktiengesellschaft

(Sd) v. Schnitzler (Sd) Selck

Document Schmitzler No. 189

Exhibit No.

I, Dr. Walter SIEMERS, Attorney-at-Law at Hamburg, at present
Defense Counsel before the American Military Tribunal at Nuremberg,
hereby confirm that the attached document:

Agreement between the Continental Dyestuffs Cartel
and the Imperial Chemical Industries Limited, London,
of 26 February 1932

is a true and correct copy of the Contract that was taken from
the I.G. Files in Frankfurt/M.

Nuremberg, 27 April 1948.

(Dr. Siemers).

A G R E E M E N T

between the Continental Dyestuff Cartel

and

Imperial Chemical Industries Limited, London.

Between the Continental Dyestuff Cartel consisting of: -

1. I.G. Farbenindustrie Aktiengesellschaft, Frankfurt a.M.,
herein called "German I.G."
2. The Basle Dyestuff Works
forming a community of interests (Interessengemeinschaft,
herein called "Swiss I.G." consisting of
 - a) Gesellschaft fuer Chemische Industrie in Basel, Basle,
 - b) Chemische Fabrik vorm. Sandoz, Basle,
 - c) I.R. Geigy A.G., Basle,
3. The French firms joined in collaboration,
herein called "C.M.C." consisting of
 - a) Compagnie Nationale de Matières Colorantes et Manufactures de Produits Chimiques du Nord réunies, Etablissements Kuhlmann, Paris,
 - b) Société Anonyme des Matières Colorantes & Produits Chimiques de Saint-Denis, Paris,
 - c) Compagnie Française de Produits Chimiques et Matières Colorantes de Saint-Clair-de-Rhône, Paris,
 - d) Société des Produits Chimiques et Matières Colorantes de Mulhouse, Paris,
 - e) Etablissements Steiner, Vernon,
 - f) Durand & Huguenin S.A., Huningue,
 - g) Société Anonyme pour l'Industrie Chimique, Mulhouse-Dornach,

hereinafter together called "Continental Group"

of the first part

and

Imperial Chemical Industries Limited, London,

hereinafter called "English Group"

of the second part

the following Agreement - Cartel - has been made: -

Par. 1. Scope and Territory covered by the Agreement.

The Agreement refers to the dyestuffs termed "contract products" in Annex I.

It comprises all countries of the world with the exception of the U.S.A. However, sales to the U.S.A. as well as exports from the U.S.A. fall under this Agreement.

The Agreement does not only refer to the signatories of this Agreement and their successors, but also to all their manufacturing and selling organisations for dyestuffs owned or controlled by them as defined in Annex I, now or in future. At the present moment the following are in particular included: On the part of the Continental Group:

Durand & Huguonin S.G., Basle,
Societa Chimica Lombarda S.E. Bianchi & Co., Rho,
Fabricacion Nacional de Colorantes y Explosivos, Barcelona,
The Clayton Milling Co. Ltd., Clayton-Manchester,
Frochits Geigy S.A., Ruingue,
Fehrmann & Co. fuer Chem. Industrie, Fabianico,
Societa Borjansca per l'Industria Chimica, Milan,
Zaklady Chemiczne w Wladyslaw, Sp.-Ak., Wladyslaw.

On the part of the English Group:

British Dyestuffs Corporation Ltd., Manchester,
British Alizarine Co. Ltd., Manchester,
Scottish Dyes Ltd., Grangemouth,
British Synthetics Ltd., Manchester,
Oliver Wilkins & Co., Ltd., Derby,
Dye Dyestuffs Ltd., Hull.

Par. 2. Quotas and Quota Accountancy.

The leading idea of this Agreement is that both parties will continue their business in proportion of their turnover ratios existing during the time from 1st January 1930 till June 30th 1931 (in the following called "reference period").

For this purpose the business volume of both parties has to be ascertained on the basis of the value-turnovers during the reference period whereby the gross amounts of invoices to customers have to be reduced to "free frontier country of production". This calculation is made in accordance with the rules defined in Annex I (Rules and Regulations to be used in determining the sales turnover for the reference period and the current quota accountancy).

From the business volume ascertained in this manner for the Continental Group the amount of L 195 000 p.a., i.e. L 292 500 for the reference period, has to be deducted and to be added to the turnover volume ascertained for the English Group. The amount of L 195 000 p.a. for the reference period corresponds to the following business-transfers:

L 90 000 United Kingdom of Great Britain and Ireland
L 75 000 Near and Far East
L 30 000 Australasia.

By the amount of L 90 000 is implied that at first the Continental/^{Group} sells goods to the corresponding value, manufactured by the English Group/^{the English Group} however, will take over the direct selling to customers just as soon as that can be done without hurting the prestige of the Continental Group.

The business volumes modified in this manner form the basis for determining the quotas. The details will be seen from Annex I.

The parties undertake to maintain their organisation for the production and sale of the contract products as far as is necessary to fulfil their contract obligations.

Par. 3. Principles for the conduct of the Cartel business
and for the Quota Accountancy.

.

Par. 4. Attitude towards Third Parties.

Arrangements with outsiders (competing firms) concerning and affecting considerably the business volume of either party can only be concluded by the Cartel management.

Before any arrangements other than such as affect considerably the business volume of the parties are made with outsiders, each party is in every case obliged to inform the other party giving it thereby an opportunity for discussion.

It is, moreover, desirable that the parties refrain from all measures which would facilitate competition of an outsider.

The English Group will continue its negotiations with L.B. Holliday & Co., Huddersfield, and will endeavour to obtain control over Holliday. Should the English Group succeed in obtaining such control, the actual turnover of Holliday during the reference period - calculated in accordance with Annex I - has to be added to the volume of the English Group during the reference period. In accordance therewith the actual sales of Holliday have to be accounted for in the current quota accountancy of the English Group

The English Group is permitted, if it so desires, to endeavour

to obtain control over other English firms and in the event of its succeeding in doing so, the turnover of such English firms, at an equitable figure to be agreed upon between the parties, shall be added to the volume of the English Group during the reference period.

The Continental Group has friendly relations with the following firms, without, however, at present possessing control over them:

Alcanta Colori Nazionali Affini, A.C.N.A., Milan,
Chemische Fabrik Röhner A.G., Pratteln,
Niederländische Farben- und Chemikalienfabrik, Delft,
Labbeux & Geroll, Lyon,
Société des Matières Colorantes de Croix-Musquehal, Roubaix,
Trelor, Société Lorraine de Produits Chimiques, St. Dié,
Iberica de Industrias Químicas S.A., Barcelona.

The Continental Group shall have the right to attain such control and then the turnover of the controlled firms shall be treated by the Continental Group in the same way as that of the English firms referred to above.

Neither party shall negotiate for the purchase of the business of any competitive firm other than those referred to in this clause, without the consent of the Cartel management. The Cartel management cannot commit either party to capital expenditure without its consent.

Par. 5. Cartel Management.

The business of the Cartel is conducted by the "Cartel Management" on whom devolve all decisions coming within the scope of this Agreement. It watches over the loyal fulfilment of the arrangements and creates all organisations essential for executing the Agreement. It has to see to it that the common interests are everywhere respected.

It is responsible for a proper price and credit policy, it will take every care that the right spirit prevails everywhere and that cordial collaboration is ensured.

The Cartel Management has to keep itself continuously informed how the business is going on in the different territories and will in particular thereby and by continuous control of the turnover acquire the basis necessary for judging the business development of each party.

It will bring about close personal collaboration between the selling organisations of the parties and endeavour to avoid any friction in selling.

The Cartel Management consists of

1. the Board of Directors
2. the Advisory Council.

The current business of the Cartel is conducted by the Board of Directors consisting of ten members. The Continental Group nominates eight, i.e. the German I.G. three, the Swiss I.G. three, and the C.M.G. two. The English Group nominates two members.

Resolutions of the Directors can only be passed if both parties concur. Each party can only give a unanimous declaration.

If, in the absence of conformity ^{of opinion} no resolution can be passed, each party can demand within a fortnight that the matter be submitted to the Advisory Council which, unless the matter comes within the jurisdiction of the Arbitration Court - see Par. 8 -, decides finally.

The Advisory Council consists of ten members ^{nominated} in the same manner as the Directors.

If the Advisory Council does not come to a unanimous decision, it shall be enlarged by two impartial businessmen of the highest standing. These two commercial experts, who need not be Dutchmen, shall be nominated for each individual case by the Chamber of Commerce (or its corresponding institution) in Amsterdam. In this enlarged Advisory Council the Continental Group has three votes, the English Group one vote and each of the experts two votes. The enlarged Advisory Council gives its decision by majority vote; the vote of each party must be unanimous.

For the members of the Board of Directors as well as those of the Advisory Council, proxies with voting-power may be nominated. Each member of the Advisory Council may act for any or all the members of his own party, and the same applies to the members of the Board of Directors. A member of Board of Directors can at the same time be a member of the Advisory Council. Other gentlemen may be called in to attend a meeting of the Board of Directors if this should become necessary in view of the points of discussion.

The Cartel Management is to be guided by the statutes of the management as per Annex II.

Par. 6 - 8

.

Par. 9. Mutual Supplies .

The Continental Group guarantees to the English Group the purchase annually of a volume of raw materials and intermediate products corresponding to the volume that corresponded at the end of 1931 to an approximate amount of L 130 000 p.a.

The Continental Group further guarantees to the English Group the purchase annually of a volume of dyestuffs corresponding to the volume that corresponded at the end of 1931 to an approximate amount of L 50 000 p.a.

The above obligations are based on the present business volume of the Continental Group in England and the present English market situation, and are therefore to be adapted, as the circumstances may require it, according to the exigencies of the prevailing sales and market conditions.

The existing works belonging to both parties in Great Britain assure to each other, for the production of the contract-products in Great Britain, the supply of raw materials and intermediate products under all circumstances, as far as it is consistent with the manufacturing capacity of the supplier and his own requirements.

Par. 10. Notice of Termination of the Agreement.

The Agreement comes into force on the 1st of January 1932 and terminates on December 31st, 1966.

If the Agreement is not denounced by either party at least four years before its expiration, it shall continue automatically for a further period of ten years, and so on.

The parties agree that this contract, which is of such long duration, shall be interpreted in accordance with the requirements of good faith and that it is - having due regard to the serious encroachments on the business organization of the parties to this contract - the general intention that its existence, above all, shall be maintained. If, therefore, in one or the other territory or in any other way, unforeseen difficulties of a serious

nature should arise, the parties shall be bound to remove these difficulties to the best of their abilities, and if they do not agree, the Court of Arbitration shall decide with due regard for the spirit and the object of the Contract.

Par. 11.

.

This Agreement is made in London, Executed by the respective Companies in accordance with their Statutes this the twentysixth day of February nineteen hundred and thirtytwo.

The Common Seal of

DEBSIL CHEMICAL INDUSTRIES LIMITED

was herewith affixed in the presence of

sgd.: HARRY Mc GOWN, Director

sgd.: E.N. WISE Assistant
 Secretary }

DES DISCOUNT FÜR CHEMISCHE INDUSTRIE IN BASEL

sgd.: L. Schmid ppa. Ziegler

CHEMISCHE FABRIK vorm. S. MOORE

sgd.: Wagner

J. R. GEIGY A.-G.

sgd.: G. Koechlin J.R. Geigy

COMPAGNIE SUISSE DE MATIÈRES CHIMIQUES ET MANUFACTURES DE

PRODUITS CHIMIQUES DU NORD RÉUNIS, ÉTABLISSEMENTS KUHLMANN

sgd.: J. Froessard

SOCIÉTÉ ANONYME DES MATIÈRES COLORANTES & PRODUITS CHIMIQUES DE
SAINT-DENIS

ad.: G. Thomaer

COMPAGNIE FRANÇAISE DE PRODUITS CHIMIQUES ET MATIÈRES COLORANTES
DE SAINT-CLAIR DU-BOIS

ad.: J. Frossard

SOCIÉTÉ DES PRODUITS CHIMIQUES ET MATIÈRES COLORANTES DE
LUIGUSE

ad.: J. Frossard

ÉTABLISSEMENTS STIEBER

ad.: G. Thomaer

DUJARD & HUGUENIN S.A., LUIGUSE

ad.: J. Frossard

SOCIÉTÉ ANONYME POUR L'INDUSTRIE CHIMIQUE

ad.: G. Thomaer

I. G. F. INDUSTRIE ANTIKORROSION

ad.: v. Schnitzler Solch

Document Schnitzler No. 182

Exhibit No.

I, Dr. Walter SIEGERS, Attorney-at-law in Hamburg, at present serving as Defense Counsel in the proceedings before the American Military Tribunal, Nurnberg, herewith certify that the attached document:

Contract dated 19 December 1934, between the
"Polish Group" and the "Tripartite Group"
(Odergruppe)

is a true and correct copy of the copy of the contract taken from the files of the I.G. in Frankfurt am Main.

Nurnberg, 22 April 1948.

(signed: Dr. Siegers)

A G R E E M E N T

The following contract was concluded between

- 1) Przemysł Chemiczny "Boruta", Sp. Akc. Zgierz,
 - 2) Chemiczna Fabryka Wola Krzystoporska, Wola Krzystoporska,
- hereinafter referred to as the "Polish Group"
- on the one hand

and

- 1) the I.G. Farbenindustrie Aktien-Gesellschaft, Frankfurt/Main
and the Durand & Hugonin S.A., Basle,
-represented by the I.G. Farbenindustrie Aktien-Gesellschaft,
- 2) the French dyestuff factories united in the CMC - Centrale
des Industries Colorantes, Paris - which are also acting on
behalf of Zakłady Chemiczne w Łodzi, Sp. Akc., Łódź,
namely:
 - a) Compagnie Nationale de Matières Colorantes et Manufactures
de Produits Chimiques du Nord Réunies
Etablissements Kuhlmann, Paris,
 - b) Société Anonyme de Matières Colorantes et Produits
Chimiques de Saint-Denis, Paris,
 - c) Compagnie Française de Produits Chimiques et Matières
Colorantes de Saint-Clair-de-Honnin, Paris,
 - d) Société de Produits Chimiques et Matières Colorantes
de Mulhouse, Paris,
 - e) Etablissements Steiner, Vernon,
 - f) Durand & Hugonin S.A., Hainque,
 - g) Société Anonyme pour l'Industrie Chimique,
Mulhouse-Dornach,

3) the following Swiss dyestuff factories, namely

- a) Gesellschaft fuer Chemische Industrie in Basle, Basle,
- also acting on behalf of Fabjanickie Towarzystwo
Akcyjne Przemyslu Chemicznego, Fabjanice -,
- b) Chemische Fabrik, formerly Sandoz, Basle,
- c) J.R. Geigy A.G., Basle,

hereinafter referred to as "Three Party Group",

on the other hand

for the purpose of regulating economic conditions in the field of dyestuffs in Poland and for the purpose of solving all related questions pertaining to intermediate products as well as for the regulation of the export interests of the Polish Group.

Par. 1

Scope of the Agreement.

The agreement concerns dyestuffs which are called "Contractual products" (Vertragsprodukte) in Enclosure 1. It comprises, as far as the Polish Group is concerned, all sales effected in the present customs area of the Polish Republic, regardless whether the sales involved dyestuffs manufactured in the present customs area of the Polish Republic or dyestuffs which were directly or indirectly imported. Where mention is made of Poland or the Polish Republic in the following, it refers to the present customs area of the Polish Republic.

Intermediate products are dealt with in par. 7 of this agreement.

The contract binds not only the Signatories of the Agreement and their legal successors but also all production and marketing agencies which at present or in the future may be acting on their behalf or under their control

in so far as they fall into the material and territorial scope of the agreement. Furthermore, the Three Party Group will, to the best of its ability, endeavor to induce the firms mentioned in paragraph 2 to adopt the directives of this agreement.

New parties may join this agreement subject to the approval of all of the contracting parties.

Par. 2.

Quotas and Allotments.

The parties agree to conduct the Polish business for the duration of this agreement in such manner that the total value of the dyestuff sales effected by both parties in Poland - calculated free border of the manufacturing country - shall be distributed as follows:

<u>in the</u>	<u>the Polish Group</u>	<u>the Three Party</u>
	<u>\$</u>	<u>Group</u>
1st year of the contract	29.5	70.5
2nd year of the contract	30.0	70.0
3rd year of the contract	30.5	69.5
4th year of the contract	31.0	69.0
5th year of the contract	31.5	68.5
6th year of the contract	32.0	68.0
7th year of the contract	32.5	67.5
8th year of the contract	33 1/3	66 2/3

The term "sales" applies to all sales effected in the area of the Polish Republic regardless whether the sales involved dyestuffs manufactured in Poland or dyestuffs which were directly or indirectly imported into Poland.

The Three Party Group shall also deduct from their quota the sales effected

by Imperial Chemical Industry, Ltd., London,
Chemische Fabrik Bohner A.R., Pratteln (Switzerland) and the
Mabbeux & Canoll, Lyon (France) firm

in or to the territory of the Polish Republic, as well as the
sales effected by the firm of

Verein fuer chemische und metallurgische Produktion,
Jussis on Elba (Czechoslovakia),

so long as the agreements between the Three Party Group and this
firm remain in force.

The export of the Polish Group will be regulated in such
manner that for the duration of this agreement the Polish Group
shall have the right to export, outside of their quota, goods
to the total value of one million Zloty at the present rate of
exchange, whereby the price of the goods will be calculated free
Polish border.

The calculation of sales as against the quotas allotted
to the two Polish parties and as against the export authorization
of the Polish Group shall be carried out in accordance with the
implementation directives as outlined in appendix 1.

Par. 3.

Principles of Business Management.

The contracting parties undertake to conduct their
business in Poland within their respective quotas without any
direct or indirect competition.

The parties assume mutual price and ownership guarantees
for their established businesses. Sales shall therefore be made in
close coordination with each other.

Established business - property status - so far as indi-
vidual products and individual customers concerned, is in prin-
ciple understood to be the business as established during the time
from 1 January 1933 to 30 Sept. 1934. Business which the Three-
Party-Group has, in compliance with the quota allocation, to trans-
fer to the Polish Group, in accordance with par. 2, will likewise
become the property of the Polish Group.

In order to clarify the position regarding the ownership of property (~~Doctrines of ownership~~) in the case of individual customers, one of the contracting parties, who believes his property rights (*Besitzstandrecht*) to have been infringed, suggested there should be an exchange of figures between the two contracting parties concerning the product alleged to have been hit by competition.

The above property settlement must not encroach upon the further technical development of the two contracting parties. If products are introduced which are not contained in the list of products of one of the Groups, any business which may have been introduced by the other Group must not be left entirely out of account. The guiding principle should be the observance of the quotas according to Par. 2.

The sales and payment conditions have been arranged by the contracting parties in an agreement concluded on 2 July 1933 (*Zielkonvention*), and which has been taken over into the contract now in question (Annex II).

The Polish Group will, in every case, conduct its export business in friendly understanding with the Tripartite Group.

Par. 3.

Intermediate Trade in Dyestuffs in the Polish Market.

To avoid disturbances in the Polish market caused by intermediate trade (*Zwischenhandel*) - disturbances which are detrimental to the purposes of the contract - the supply of dyestuffs to dealers must be kept within the bounds of what is economically necessary. To assist in carrying out this rule a list of dealers will be drawn up.

In the main, dealers are only those firms which conduct the business usually carried on by merchants in Poland, but not those firms which really act as agents for the contracting party making the deliveries. These firms must observe the regulations regarding property as well as those contained in the "*Zielkonvention*", and the contracting party in question must see that this is done. Arrangements have been made to supplement and amend the list of dealers.

With the exception of those firms whose names appear in this list, dealers residing in Poland must not be supplied, unless they are so-called "retailers", i.e. dealers who do not buy more than 100 kilos of dyestuffs from each contracting party in the course of a year.

Par. 5.

Accountancy

In order to carry out the current quota agreement, both Groups will every month, on the last day of the month following the month when the exchange takes place, exchange the figures of their dyestuffs turnover arrived at in accordance with the regulations of Annex I.

The object of this exchange of figures is to give the contracting parties the data for maintaining the quotation in the Polish market, thus enabling the business to be conducted in such a way that the turnovers attained correspond at the end of the business year as far as possible with the quotas arranged under the agreement. Should nevertheless, the conditions provided for by the quota arrangement not be obtained by suitable measures in direct sales to customers, the contracting party which has exceeded its sales quota during the business year (the "overdeliverer") must adjust this ^{by} making to the other contracting party which has not attained its sales quota (the "underdeliverer") a monetary payment of 20% of the overdelivered value as shown by the exchange of figures.

If the Polish Group exports dyestuffs, in exercise of its right to export in accordance with Par. 2, it must likewise render a monthly account showing the sales values "free Polish frontier".

Par. 6.

Control of the observance of the regulations governing sales and Quota Accountancy.

The contracting parties shall appoint an agent (Konventions-vertrauensmann), whose task it is to control the carrying-out of the regulations in accordance with the final agreement (Zielkonvention), as well as the observance of the other regulations governing sales, and who shall have access to all data in cases of doubt.

The appointment of this agent (Konventionsvertrauensmann) shall be made by mutual agreement of the contracting parties on the suggestion of the Polish group. A common contract shall be concluded with the agent defining his sphere of activity, his rights, and his duties. The contracting parties undertake to recall or dismiss the agent should one of the contracting parties demand it.

Salary and allowances for the agent shall be paid by the contracting parties in proportion to their contractual allocations.

A special committee shall be appointed to ensure that turnover figures are calculated in accordance with the provisions of Appendix I.

The Committee shall consist of one delegate each from the Polish group, the CMC, Business, the IG, and the Swiss Dyestuffs Works. / Rules

shall be drawn up to define the activities of the committee, which will be attached to the contract as Appendix III. Each contracting party shall bear the expenses incurred by its delegates.

Article 7.

Dyestuffs Production in Poland and intermediate products.

In the interests of an efficient distribution of production there will be close technical cooperation.

A special technical committee will supervise such cooperation.

When the production of dyestuffs which have not previously been manufactured in Poland is taken up, duplication must as far as possible be avoided. In cases where a duplication of production already exists,

the question will have to be investigated as to what extent duplication can be discontinued in the interests of the economic or technical position.

Generally speaking, the expansion of intermediate products shall be the prerogative of the Polish group. The right to make exceptions on a small scale for economic and technical reasons shall, however, be reserved. The agreement reached by Winnica and the War Ministry on 23 April 1931 shall not be affected by this clause.

The Tripartite Group is prepared to cover with the Polish group in preference to other sources the intermediate products requirements of their plants in Poland, provided quantitatively and qualitatively adequate supplies, satisfactory schedules and prices can be guaranteed. The Polish group undertakes to supply the goods, unless questions of patent law are involved.

Sales prices for the intermediate products concerned shall be fixed in advance for the coming business year during the last quarter of the current year.

The Polish group is prepared to meet any requirements of intermediate products and dyestuffs it may have from the Tripartite Group, in preference to other sources of supply, provided quality and prices of goods offered by the Tripartite Group are reasonable (konkurrenzfähig). The Tripartite Group promises to supply to the Polish group, unless questions of patent law are involved, under conditions corresponding to those mentioned in paragraph 5 of this article, intermediate products manufactured in Winnica and Fabjanice. Apart from that, the Tripartite Group will continue to supply to the Polish group, under corresponding conditions, the intermediate products and dyestuffs supplied in the past.

The contracting parties are agreed that third parties must not be assisted by the export from Poland of intermediate products.

Dyestuffs shall not be supplied directly or indirectly to other Polish dyestuffs manufacturers.

Article 8
Industrial - - -
Patent Rights. - -

Present patents and trade marks, or patents and trade marks to be acquired, including the right to prosecute in accordance with normal legal methods, will not be affected by the proposed contract. Differences of opinion should, however, be disposed of by means of friendly discussion if possible.

Article 9

- Implementation of the -
- Contract. -

For the implementation of the regulations relating to sales in this contract, a committee will be set up in Lodz, composed of the responsible chiefs of the sales organisations of the individual partners. Offences by the sales agencies against the principles and conditions of sale laid down by the main firms, and in particular against the agreed credit terms, will incur the penalty for breach of contract, and a repetition will be punished by the dismissal of the agent concerned. These penalties will be imposed by the main firms (cf. also Appendix IV).

It is moreover proposed that at regular intervals plenary sessions of the representatives of the main firms be held, at which all current problems can be dealt with.

All decisions to be made within the framework of this agreement require the unanimous consent of both Groups.

Any points of dispute which may arise are to be submitted for settlement to a committee composed of representatives of the senior agencies in charge of the business of the Polish Group and of the Tripartite Group.

Article 10.

Duration of contract.

The contract takes effect as of 1 January 1935 and has been concluded for a term of 8 years.

If notice is not given 1 year before the termination of the contract for the first time on 31 December 1941 at latest - it is automatically extended over a further term of 5 years, until such time as a year's notice is given.

The Polish Group undertakes the legally prescribed entry of the /contract in the /
Polish cartel register.

Article 11.

Adaptation of contract to altered conditions.

Should circumstances arise during the term covered by the contract which are not predictable today, and which introduce a considerable change within the sphere of the contract, the parties undertake to discuss the situation in a friendly way and to seek the type of settlement which will make it possible for the contract to stand.

Article 12.

Secrecy.

As far as the outside world and in particular the clientele is concerned, the strictest secrecy is to be preserved as to the general content as well as ^{to} the individual regulations of this contract.

Article 13.

Addresses of contracting parties.

The following are given as the addresses of the Polish Group and of the Tripartite Group for all official correspondence to be conducted in connection with the contract:

Przemysł Chemiczny "Boruta" Sp. Akc., Zgierz,

on the one hand

and the

I.G. Farbenindustrie Aktiengesellschaft, Frankfurt/M.,

on the other hand.

Notice is considered valid if it is dispatched by telegraph, with confirmation by registered letter, within the period provided for in the contract.

The following Appendices are attached to this contract as integrating data:

- I/ Regulations for quota accountancy.
- II/ Agreed credit terms.
- III/ Business agenda for the Control Commission.
- IV/ Penalty regulations.

Warsaw, 19 December 1934.

Przemysł Chemiczny "Boruta", Sp. Akc., Zgierz.

signed: Maciszewski

Chemiczna Fabryka Wola Krzytotoporska, Wola Krzytotoporska

signed: Szpilfogel

I.G. Farbenindustrie Aktiengesellschaft, Frankfurt am Main,
and for Durand & Huguenin A.G., Basel

signed: v. Schnitzler

signed: W. Muehlen

Compagnie Nationale de Matières Colorantes et Manufacturées
de Produits Chimiques du Nord réunies Etablissements Kuhlmann, Paris,
and for Zakłady Chemiczne w Winnicy, Sp. Akc., Winnica

signed: G. Theumar

Société Anonyme de Matières Colorantes et Produits Chimiques
de Saint-Denis, Paris,

signed: G. Theumar

Compagnie Française de Produits Chimiques et Matières
Colorantes de Saint-Clair-du-Rhône, Paris,

signed: G. Theumar

Société des Produits Chimiques et Matières Colorantes
de Mulhouse, Paris.

signed: G. Thomaer

Etablissements Steiner, Vernon.

signed: G. Thomaer

Durand & Hühnerlin S.A., Hünigau.

signed: G. Thomaer

Société Anonyme pour l'Industrie Chimique, Mulhouse-Dornach.

signed: G. Thomaer

Gesellschaft fuer Chemische Industrie in Basel, Basel,
and for Fabrycznia Towarzystwo Akcyjne Przemyslu
Chemicznego, Fabjanice.

signed: A. Schmid signed: Schulthess

Chemische Fabrik vorm. Sandoz, Basel.

signed: Imhoff

I. R. Geigy A.G., Basel.

signed: C. Koechlin signed: Moorikofer.

A f f i d a v i t .

I, Dr. Alfred H e f f m a n n , living in Leverkusen, Kaiser-Wilhelm-Allee 3, have been duly warned that I shall make myself liable to punishment by making a false statement. I declare on my oath that my statement is true and that it was made in order to serve as evidence at Military Tribunal VI in the Palace of Justice in Nuremberg, Germany.

From June 1934 until the end of the war, I was employed in the Chemistry Division of the Reich Economics Ministry, at first as Assessor, later as Regierungsrat and Oberregierungsrat. In this capacity I participated in conferences on the French dyestuff industry, held after France had been occupied. I recall that at one of these conferences, which had been called to discuss the negotiations to be carried on with the French dyestuff manufacturers for the purpose of founding a common German-French dyestuff manufacturing combine, Dr. von Schnitzler stated explicitly that he thought it essential to treat the French industry correctly and fairly, and not to exert any pressure, since after the war, there would have to be co-operation again between the German and French

industries, and this could only be achieved only on a voluntary basis.

Leverkusen, 24 March 1948

signed: Dr. Alfred Hoffmann
(Dr. Alfred Hoffmann)

I herewith certify that the above signature of Dr. Alfred Hoffmann was appended here, in my presence, by Herr Dr. Alfred Hoffmann, living in Leverkusen, Kaiser-Wilhelm-Allee 3.

Leverkusen, 24 March 1948.

signed: Dr. Hugo Schramm,
Attorney-at-Law, Defense Counsel.

Affidavit.

I, Dr. Edgar Michael, born on 16 June 1897 in Waiblingen in Wuerttemberg, have been duly warned that I shall make myself liable to punishment by making a false statement. I declare on my oath that my statement is true and it was made in order to be submitted as evidence at the Military Tribunal VI in the Palace of Justice in Nuremberg.

I.

After finishing my studies and my temporary employment in the service of the Wuerttemberg State Administration, I was appointed as an Assessor to the Reich Ministry of Economics in Berlin on 1 April 1925. From that time I worked in the Reich Ministry of Economics without interruptions until the collapse, at first as Referent and later as the head of a department, which amongst other things, dealt with problems of home trade (wholesale ^{and} retail), industrial law, market regulations, unfair competition, as well as official trust companies and auditing. By the time the war broke out I had, in the ordinary course of regular advancement, of a civil servant, reached the grade of a Ministerialdirigent in the Reich Ministry of Economics.

1) On 13 July 1940, I was appointed as Militaerverwaltungschef (Official of the Military Administration) for the duration of the war and transferred to Paris as the head of the Economics Division in the Administration Staff of the Military Commander

of France. I was shown the document concerning the so-called "New Order" in France, (Book 51, Documents No. NI-11252, Exhibit 1051) and the accompanying letter of 3 August 1940 which was written to Ministerialdirigent Dr. Schlotterer in the Reich Ministry of Economics submitted by the Prosecution in the I.G. Farben case. I can only declare that until my transfer to France I had heard nothing whatsoever in the Reich Ministry of Economics about a "New Order", I only knew that after conclusion of the armistice with France in June 1940, Dr. Schlotterer received from the Reich Ministry of Economics, Funk, the order to work out suggestions for an economic peacetime order.

As far as I know, no plans had been worked out in the Reich Ministry of Economics for the incorporation of European production into the German war economy, or dealing with the "spoliation" of countries which were occupied in the course of military operations. It is true that ideas concerning an All-Europe Economy, involving large territorial units and striving towards the peaceful unification of the European states, had been discussed in public on various occasions before the war. I remember in particular the numerous articles in newspapers and magazines written and published by Werner D a i t z in Luebeck, at that time an ambassador.

2) As soon as I began my activities in France, I considered it to be the most important task of the Economics Branch of the Military Commander to start up again as quickly as possible the industrial production of the occupied French territory, if only to reduce or to eliminate entirely the very great number of unemployed persons at the time in that area.

At first this intention of mine met with a certain resistance from the Central Agencies in Berlin (Four Year Plan, Reich Ministry of Economics, where it was thought to be more advantageous to await further developments and to start up French industry slowly and gradually. This point of view was shared by many persons at a conference which took place at the end of July in Paris, on the occasion of a visit by State Secretaries Landfried (Reich Ministry of Economics), Neumann (Four Year Plan), Backe (Reich Ministry of Food), Under State Secretary General von Mannecken (Reich Ministry of Economics) and others. In agreement with the Military Commander, however, I supported the opposite point of view. As far as I remember, the only condition which was enforced, was that before a plant could be started up, it had to have permission from the Military Administration Headquarters competent for that area.

We certainly had to cope with great difficulties during the summer and fall of 1940, in our endeavors to carry out our intentions. Millions of Frenchmen had fled to the South of France before the advancing German army. Owing to this exodus of refugees, there was a shortage of people, especially everywhere in the occupied zone of France, particularly engineers and skilled workers, who were indispensable for starting up production again. In addition, most means of transportation were still out of commission owing to the destruction of bridges, which had first to be re-built.

By late autumn 1940, however, we had succeeded in bringing about some kind of order, so that

systematic industrial production could be started up again. Some of the difficulties, of course, continued to exist. This was particularly so in the case of deliveries of coal for the occupied as well as the unoccupied zones. Here, to the difficulties of transportation were added difficulties of an administrative nature, resulting from the fact that the two provinces of Northern France "Nord" and "Pas de Calais", which contain the most important French coal mines, were under the command of the Military Commander of Belgium, who was garrisoned in Brussels, and who was styled the "Military Commander of Belgium and North France". Especially as far as coal was concerned, there were considerable differences of opinion between the two commanders, differences which lasted during the entire period of the occupation. Whereas the Military Government in Brussels insisted that deliveries from the mines of Northern France were to supply in the first place the North of France and Belgium, the Economics Division of the Military Administration in Paris took the view that all coal hauled in the two provinces of Northern France should be distributed over the whole of France in accordance with the economic necessities, and that the area under the command of the Military Commander in Paris must on no account fare worse as regards supplies than the two Northern provinces. On account of these and other difficulties resulting from the separation of the two Northern provinces from the competency of the Military Commander in France, the Military Commander in Paris, as well as the French Government, continued to insist that the two Northern provinces be put under his administration. Unfortunately this proposal was never heeded.

II.

1) Among the questions with which the Economics Department of the Military Commander-in-Chief had to deal, that of the purchase by German firms of shares in French enterprises soon began to play a part. In this connection, the Reich Ministry of Economics and the Economics Department of the Military Commander-in-Chief both maintained the attitude that the purchase of shares in French industrial enterprises was interesting from the German point of view, but that such purchase of shares should be effected on the basis of voluntary commercial negotiations and the voluntary conclusion of agreements only, and that there must be no question of the exertion of pressure, as only interests acquired by the free consent of both parties, and developed along prescribed commercial lines, are of any real value. Furthermore, the Economics Department had, from the outset, represented the point of view that there should, on principle, be no question of the acquiring of majority shares, more especially since it would otherwise have been difficult or impossible to obtain the approval of the French Government which, in accordance with French law, was necessary in each case of the purchase of interests in French enterprises by foreign buyers.

2) With reference to Prosecution Document NL-6839/Exhibit 1241, I should like to state that I do not remember having taken part in a conference with Herr Mann, Dr. Grobel, Dr. Krueger, Dr. Kugler and Dr. Terhaar of the I.G.-Farbenindustrie Aktiengesellschaft during the period from 31 August to 2 September 1940 at my office in Paris. I do, however, consider it quite out of the question that I should have said what I am supposed, according to Fig. IIb on Page 7 of the document, to have said, in the way in which I am supposed to have said it, namely that I stressed as the principle on which

I worked the fact that we must exploit to the full the "historical opportunity which is being given us to adjust French Industry to the German industrial system by way of timely and suitable interference in the workings of French industry as a whole. Not only would such a statement have been contrary to my attitude to the problem as a whole and to my conviction of the necessity for genuine mutual understanding between Germany and France, but it would also have contradicted the policy of reticence in speaking to individuals which I had pursued throughout my long years of service in the Ministry of Economics, more especially since, (with the exception of Terhaar) I did not know these gentlemen previously. In my opinion, the purport of my statements can only have been that, within the scope of its authority, the Economics Department of the Military Commander-in-Chief should make an effort, in its dealing with the French Economy, to protect the rightful interests of the I.G.

As far as I remember, in about August or September 1940, Dr. Kramer, the Chief of the SOPI (Société pour l'Importation de Matières Colorantes et de Produits Chimiques, Paris) reported to me that M. Frossard of the firm of Kuhlmann had told him that he was of the opinion that, in view of the long-standing connections between the I.G. and the Etablissements Kuhlmann it must be possible, in spite of everything, to re-establish a basis of collaboration between the two firms, in the field of dyestuffs. Whether and to what extent further discussions on the possibility of such collaboration took place at that time between Dr. Kramer and perhaps also Dr. Kolb, Chief of the Chemistry Department (Chemie-Referat) of the Economics Department on the one side and representatives of the firm Kuhlmann on the other, in connection with this statement of M. Frossard, I do not know. I do, however, remember that I learnt from a report delivered by

Dr. Kolb, Chief of the Chemistry Department, that official negotiations between representatives of the French dyestuffs industry and the I.G. were now to take place in Wiesbaden. Envoy Mammen, Chief of the German Armistice Delegation for Industry in Wiesbaden, had been requested in writing by the President of the French Armistice Commission to call together representatives of the firm of Kuhlmann and representatives of the I.G. for the purpose of negotiations on the subject of collaboration in the field of Chemistry.

3) As far as I remember, it was not until January 1941 that I was officially notified by the German participants, namely Dr. von Schnittler and Dr. ter Meer, of the private business conferences held in Paris. It was at the end of February or the beginning of March that I was first told by members of the French Government, namely Puchaux, the then Production Minister and Barraud, Delegate General for Franco-German economic Relations, of the state of negotiations. I was informed that, during the private business negotiations held by the two parties in Paris, an agreement had been reached on the foundation of a combined manufacturing company, but that the German claim to a majority share of 51 % of the capital of the Company to be founded still stood in the way of a complete agreement. The representatives of the firm of Kuhlmann were said to have stated that the decision on this matter must be left to the French Government. Messrs. Puchaux and Barraud told me that they feared a state in which Germany would hold a majority share of the capital in French industrial undertakings.

and that they could not possibly consent to such majority holdings which would, moreover, of necessity render sound Franco-German industrial collaboration more difficult. As far as I remember, I told them that I fully understood this point of view, being myself an opponent of such a system of majority holdings, which, in the long run, served no useful purpose. As the I.G. interpreted the situation, however, this was an extraordinary and exceptional case, as the I.G. had old rights dating back to the period following the first world war and was thus faced with a "unique situation". Finally, the representatives of the French Government said that it would be a very different state of affairs if I could state, with the full authority of the German contracting party that the holding of such a majority interest in Franco-German would in no way exercise a prejudicial effect on further German financial participation in French industry.

Having given a report on the subject to Funk, the Reich Minister of Economy in Berlin, I was later authorized, to make a statement to the effect that these French requests would be complied with. Thus it was that the meeting of 12 March 1941, of which I was Chairman, and in which representatives of the I.G. and representatives of the French Government and the French Dyestuffs industry took part, took place in the Hotel Majestic, the premises of the Economics Department of the Military Commander. During this meeting of which the minutes introduced in Court give a clear and complete account, the above-mentioned statement of policy having been made by me, Barnaud, the Delegate General for Franco-German Economic Relations

stated that the French Government agreed to the formation of the Francolor manufacturing company, in which Germany would hold 51 % of the shares. Shortly afterwards, this statement was repeated by the French Government in writing. My impression was that, apart from the official statement that the 51 % German interest would have no prejudicial effect whatsoever on other cases, the decisive factors in the consent of the French were that, in accordance with the terms of the contract concluded, the French Group would receive a large block of I.G. shares, thus becoming the largest shareholder in the I.G., that, in accordance with the statutes of the Francolor, the Chairman of the Aufsichtsrat was always to be a Frenchman and that, in accordance with the appendix to French stock laws previously ratified, the rights of the President were considerably increased.

4) With reference to Document NI - 13567, Prosecution Exhibit No. 1852, I am in a position to make the following statement:

M. Raindre was never present during the negotiations conducted by me on the subject of the Francolor. I am not aware, either, of M. Raindre's ever having been present at the economic negotiations in Wiesbaden or at the private business negotiations held in Paris. As far as I know, ^{M. Raindre} was not a member of the staff of "SOPI" either. I do not know on what sources M. Raindre based his communication to Dr. Schlotterer. M. Raindre's assertion that I had taken the Francolor matter as far as Laval, is a pure fabrication and totally without foundation. I had no dealings whatsoever with Laval in connection with the Francolor affair.

Furthermore, at the time when I was concerned with these negotiations, Laval was no longer in the Government. Moreover, I never spoke to Darlan, his successor, about Francolor either.

I did not meet M. Raindre until later, I believe it was in 1944, on the occasion of a visit from Dr. Ilgner. My impression at that time was that he belonged to certain financial circles.

5) Of the order contained in Document NI - 4894, Exhibit 1340, I knew nothing. The arrangement was not made by the Economics Department of the Military Commander in Chief for France. The matter in question was obviously some measure connected with the technicalities of administration, taken by the Military Commander in Paris, who, at the time, still worked independently of the Military Commander in Chief for France and who only became one of the Town Commandants working directly under the orders of the Military Commander in Chief for France in August of that year. It should therefore not be regarded as seizure of property. I assume that it was a measure designed to prevent interference in the affairs of the plant on the part of unauthorized German or French offices.

6) In conclusion, I should like to state that, as far as I was able to observe, relations between the I.G. and Francolor, the French contracting partner, during the occupation period following the conclusion of the Francolor contract, developed along strictly regular lines, from the commercial point of view. As far as I know, there were never any cases of differences of opinion.

Munich, 21 April 1948

Signed: Dr. Elmar Michel

Schnitteler No. 184

I, Leopold Krafft von Dellmensingen, herewith attest and
certify the above signature, appended in my presence by Dr.
Elmar Michel.

Muornberg, 21 April 1946.

Signed: Leopold Krafft von
Dellmensingen

Document Schnitzler No. 185

Exhibit No.

I, Dr. Walter SIEBERS, Attorney-at-Law at Hamburg, at present
Defense Counsel at the American Military Tribunal in Nuernberg,
herewith certify that the attached document:

Letter from Mr. L. Prossard, Paris,
to Director Wank, I.G. Farbenindustrie A.G., Frankfurt/M.
dated 30 December 1941

is a photostat copy taken from the files of the Farbenfabriken
Bayer, Leverkusen.

Nuernberg, 22 April 1948.

signed: Dr. SIEBERS

Translation

145, Boul^d. Haasemann

Paris, 30 December 1941.

Director W o n k

I. G. Farbenindustrie A.G.

F r a n k f u r t / M a i n

Dear Herr W o n k,

Permit me to convey my sincerest wishes to you and
your family for the New Year.

By reason of our former connections we have known
for a long time most of the gentlemen who will support us during
the difficult times which we have to go through at present.

I have known you personally for a few months only,
but I am convinced that, owing to your wide knowledge and your under-
standing attitude, only a short time was needed to realize that we
shall be able to work in future in the best interests of the tech-
nical development of the FRANKLOR.
Please accept, dear Herr W o n k, my best and most courteous regards.

signed: L. Frossard

- AFFIDAVIT -

I, Dr. Hans KUNTZE, domiciled at Stuttgart-Obertürkheim, Johannisbeerstr. 9, at present Manager of the Vereinigung der Maschinenbauanstalten von Württemberg-Baden, have been warned that I shall be liable to punishment for making a false statement.

I herewith declare under oath that my statement is true and was made in order to be submitted as evidence to the Military Tribunal VI in Germany, in the Palace of Justice at Nuernberg,

Between 1940 and 1944, in my capacity as Secretary of the German Chamber of Commerce in Paris, and while I was temporary Consultant for economic questions to the German Embassy in Paris, I had occasion to meet some of the leading men of the Vichy Government.

Barnaud used to work at the Worms Bank. The partners or close business connections of this Bank were always regarded by the Germans with considerable scepticism. The Worms Bank had many international connections and had succeeded in maintaining everywhere a dominating influence in industry by means of an extremely clever personnel policy, and without making any large investments. Barnaud was regarded as one of the exponents of this strong industrial influence. The offices of the Military Administration considered him to be an independent character who would not hesitate to display this independence. They could never expect him to obey blindly or concur unreservedly with German wishes.

His personal relationship to the Chief of the Economic Department at the Military Commander's, Dr. Michel, was good. I believe the two respected each other because Dr. Michel saw in Barnaud the straightforward and courageous Frenchman, who under no circumstances would sell himself to the occupying power, whereas Barnaud naturally respected Dr. Michel's readiness to appreciate and respect his attitude.

Barnaud and Puchoux (the latter will be mentioned later) were rather strongly opposed to the German authorities, at least at first.

Jean Puchoux came from industry. He was the key man at Japy's, a very ambitious man who acted at first as the leader of French industry during the first discussions on how to fit French production into the German overall planning, and who later became Minister of Production. Shortly before that time I had a long private talk with him, during which he expressed all the inner conflicts which everybody had to face who took over a government job in an occupied country. As far as I can judge, Puchoux was never a collaborationist in the sense usually attributed to this word. He took over the post of Minister of Production because he thought he could help to bring about a sensible development of planned production. He accepted the post because he was ambitious. From the moment he became Minister of the Interior he showed himself to be

more and more opposed to the Military Government and the German Embassy. At that time he no doubt allowed himself to be influenced very strongly by the developments in the then still unoccupied zone of France, and cut himself more and more adrift from the occupying power.

Paul Bichelonne seems to have regarded his office as Secretary General, and later on as Minister for Industrial Production, purely as a technical-organizational task, to which he dedicated himself passionately. He was not at all politically minded, and it is hardly probable that he took any active part in the important political decisions of the governments to which he belonged. He conceived his task to be the setting up of an organization, whereby the production and distribution of all industrial products could be secured even in times of shortages.

Bouthillier, Minister of Economics and Finance in 1940 and 1941, was possibly the most inscrutable person of all the men above mentioned.

My impression, which was shared by industrial circles, was that of all the economic department ministers of the French Government Bouthillier right from the beginning represented most strongly the opposition against the occupying power. I shall always remember his speech which he made in January 1941 before the representatives of German economic organizations and of the parallel French organizations in regard to the transfer of orders (Auftragsverlagerung) which had just been introduced. In very plain and rather incisive words, he voiced his doubts and objections regarding the proposed transfer of orders, and his frankness caused considerable surprise in German circles.

If I remember rightly, Bouthillier was also the first of the men mentioned in this affidavit to resign from his government work.

Stuttgart, 3 April 1948

signed: Dr. Hans Kuntze

I herewith certify and attest that the above is the signature of Dr. Hans KUNTZE, domiciled at Stuttgart-Obertürkheim, Johannisbörstr.9, and was made today before me.

Stuttgart, 3 April 1948

signed: Dr. Leopold Krafft von
Dollensingen
(Dr. Leopold Krafft von Dollensingen)
Defense Counsel at the Military
Tribunal VI at Nuremberg.

A f f i d a v i t .

I, Dr. Erich Berndt, Attorney-at-Law and Notary in Frankfurt am Main, Steinalstr. 11, German citizen, have been warned that I shall render myself liable to punishment by making a false affidavit.

I declare upon oath that my statements are true, have been made voluntarily and without coercion and were made in order to be submitted as evidence to the Military Tribunal No. VI at the Palace of Justice in Nuremberg, Germany.

I. From 1 October 1937 until March 1945 I was judge of the Registry Section of the Frankfurt Lower Court.

II. I knew from this work of mine that during the war, on orders enforced by the authorities, foreigners were forbidden to sit on the Aufsichtsräten (Supervisory Boards) of German Aktiengesellschaften. Therefore, they were not permitted to receive any information about these companies, to be included in written decisions or to be invited to conferences. Therefore, the reelection of a foreigner - especially of a citizen of a country with which Germany was at war - as Aufsichtsrat (Supervisory Board) member of a German Aktiengesellschaft was impossible during the war.

Nuremberg, 14 April 1948

signed: B e r n d t
Dr. Erich Berndt

Document Schnitzler No. 187

Exhibit No.

I herewith certify that the above signature of Dr. Erich Berndt,
domiciled in Frankfurt on Main, Steinlestrasse 11 - recognized by me
to be genuine - was made here before me.

Nuremberg, 14 April 1948

signed: Karl Bornemann
Karl Bornemann
Defense Counsel

A f f i d a v i t .

I, Hermann W e i l t e r , Chartered Accountant, born on 28 February 1892 at Lungenberg, domiciled in Wiesbaden-Liebriem, Strasse der Republik 9, have been warned that I shall be liable to punishment for making a false affidavit. I declare on oath that my statements are true and were made in order to be submitted as evidence to the Military Tribunal No. VI at the Palace of Justice in Nuremberg, Germany.

From the records which I looked over concerning Francolor, the following prime values are shown for the property provided for Francolor by the French factories:

Land	Frs.	11,800,000.—
Factory buildings	"	138,315,000.—
Machines etc.	"	326,744,000.—
Workers' houses and sundries)	F	25,663,000.—
in total:	Frs.	502,522,000.—

This is exactly the same sum which was mentioned at the time by the French Group, adding "Value tel quel for all objects" and in accordance with "Schnitzler Document No. 54, volume III, file-memorandum concerning the German-French conference of 16 to 19 June 1941" shown to me by Dr. Dieners. In this memorandum it was also explained that the French had calculated the prime values at 502,5 million French francs without taking the previous amortizations into account.

If I.G. had wanted to take advantage of the political situation at that time, it could have demanded, in accordance with the customary procedure that the amortisations be taken into account. Then the situation would have been as follows:

It is customary in the chemical industry, and was also so handled by Francoeur later on, that every year 10% deductions are made on the prime values of machines, 5% on factory buildings and 2% on dwelling-houses. Considering conditions in French dyestuff factories at that time one can fairly assume that these plants had already been in operation on the average for at least 5 years. Thus on the basis of this cautious assumption, 50% ought to have been deducted on the first cost of machines for a five-year depreciation in value, 25% on the first cost of the factory buildings and 10% on that of the dwelling-houses. According to this, the prime values of a round sum of 500 million French francs ought to have been reduced by about 200 million French francs in view of the depreciation in value. The temporary value, thus the value at the time the Francoeur agreement was made, amounted to about 300 million French francs. Still another round sum of about 20 million French francs was added covering sundry values, thus in total 320 million French francs. If therefore, I.G. had actually wished to take advantage of the situation at that time, even abiding by the usual commercial calculations, the French factories ought to have been entered with only 320 million French francs, whereas in fact they were entered with 800 million French francs.

If in this calculation they had been willing to be helpful and take into account the depreciation of the franc,

the total value of the contributed assets would have been increased to 500 million French francs.

If, instead of that, I.G., when the agreement was concluded, took 800 million French francs as a basis and on the other hand turned over the I.G. shares at the rate of 160%, although at that time the rate amounted to nearly 200% and their value within Germany was still considerably higher, this is to be attributed to the fact that in favour of the French Group I.G.

- a) undervalued its own shares and
- b) overvalued the French factories.

Wiesbaden-Biebrich, 25 March 1948
Nürnberg

signed: Hermann Walter
(Hermann Walter)

I herewith certify that the above signature of Herr Hermann Walter, domiciled in Wiesbaden-Biebrich, Strasse der Republik 9, was made before me, Friedrich Silcher, Attorney-at-Law.

Nürnberg, 25 March 1948

signed: Friedrich Silcher
(Friedrich Silcher)

Attorney-at-Law.

I, Dr. Walter S i e m e r s , Attorney-at-Law in Hamburg,
at present Defense Counsel at the American Military Tribunal in
Nuremberg, herewith certify that the attached document :

my letter of 8 April 1948 addressed to the Secretary
General of the Military Tribunal No. VI including the
questionnaire to the Swiss citizen, Carl Koechlin,
was correctly copied from the original carbon copies.

Nuremberg, 30 April 1948.

signed: (Dr. Siemers)

Dr. Walter SIMERS
Attorney-at-Law

Nurember, 8 April 1948
Room 5-N

To the
Secretary General of
Military Tribunal VI,
via the Defense Center.

Attention:
Major SCHAEFER.

I would like to ask you kindly to forward the questionnaire,
of which two copies are enclosed to the Swiss citizen:

Direktor Carl KESCHLIN,

c/o J.R. GEIGY A.G., Basel, Switzerland, Goller Strasse.

In the questionnaire Herr KESCHLIN is asked to answer a
number of questions which are important for the defense of
Herr Dr. von SCHWITZER. Herr von SCHWITZER informed his Defense
that he has known Herr KESCHLIN for several years - even before
the war - and maintained business relations with him; he says that
Herr KESCHLIN is in a position to give full particulars concerning
these relations and to pass judgment on his personality as far
as business as well as politics are concerned.

The prosecutor, Mr. BREXEL A. SPRENGER, has raised
no objections to the forwarding of the questionnaire.

Respectfully yours

By Commission of Dr. SIMERS,

Enclosures.

(Dr. v. HELLER)

Questionnaire

for the Swiss Citizen,

Mr. Carl E. SCHEITLER,

c/o J. G. GEIGY A.G., Basel/Suisse

1. What position in business did you have or do you have now ?

- a) Before the war:
- b) During the war:
- c) After the war:

2. How did your relations with Dr. v. SCHEITLER begin ?

- a) Did you know him as a private individual even before you entered into business relations with him ?

If yes, since when and in what manner ?

- b) When did your business relations with Dr. v. SCHEITLER begin and in what connection ?

- c) In which periods and in what manner did your connection with Dr. v. SCHEITLER develop, in connection with business problems ?

d) At business conferences, what position did Dr. v. SCHEITLER occupy and what position did you ?

Did you and Dr. v. SCHEITLER participate in the same manner in these conferences and at the conclusion of business deals or agreements ?

3. What was the personal attitude of Dr. v. SCHEITLER in the discussions which he had with you in connection with treatment and handling of business problems and what part did he take in the same ?

4. In your opinion, what position did Dr. v. SCHEITLER occupy within the I.G. Farbenindustrie Aktiengesellschaft, i.e. what rank did he have in this concern according to your estimate ?

5. How did you regard, from a Swiss point of view, the fact that Dr. v. SCHEITLER as the representative of the I.G., carried out the negotiations which he had with you and in general conducted the international business negotiations in the field of dyestuffs ?

6. In what manner did Dr. v. SCHEITLER conduct the negotiations with your company, with the Swiss dyestuff industry, as well as with the same enterprises abroad ?

Did Dr. v. SCHEITLER always ruthlessly make use of the available business opportunities at these conferences

- which were open to the I.G., or did he recognize the interests of the foreign companies and negotiate in an obliging manner ?
7. Did Dr. v. SCHMITZLEB use any political or National Socialist methods of pressure at these negotiations ?
8. How do you judge, in an entirely general fashion, the personality of Dr. v. SCHMITZLEB, taking into consideration his position abroad and within the framework of the international negotiations ?
9. What was Dr. v. SCHMITZLEB's attitude towards National Socialism ?
10. Did Dr. v. SCHMITZLEB talk to you at any time before or after the beginning of the war, concerning his judgement of and his attitude towards National Socialism and if the occasion presented itself, what was his attitude ?
11. Did Dr. v. SCHMITZLEB talk to you at any time before or after the beginning of the war, about the situation in Germany (possibly considering the Munich agreement of 29 September 1938, the occupation of Prague in March 1939, and the danger of war which had been frequently discussed in 1938 and 1939) ?

Copy

The Manager of the Reich Chamber of Economic

4 November 1943

V. 1544/43

To the Reich Minister of Economics, Berlin.

Re: Liquidation of Enemy Property.

Dear Sir,

I may be permitted to refer to the conversation between you and Generaldirektor Zangen on the above subject. The Select Advisory Committee of the Reich Chamber of Economics dealt with this question in its last meeting. I may be permitted to explain to you the conception of the industrial economy as it was unanimously represented in the Select Advisory Committee of the Reich Chamber of Economics. The Reich Chamber of Economics knows very well that a predominantly political matter is involved in these questions, the judgment of which depends also to a great extent upon the attitude of the enemy countries. The Reich Chamber of Economics is neither authorized nor in the position to take up a definite attitude to this political part of the question, which must only be judged from the standpoint of the Reich leadership. However, the Reich Chamber of Economics feels the obligation to point out the economic viewpoints connected with the execution of liquidation measures, which, in its opinion, must also be taken into account. If, as is variously stated, regard will also be had, in the planning of any liquidation measures, to the alleged wishes of economic circles in this respect,

the Reich Chamber of Economics considers it important to point out that it is not the desire of the authoritative representation of the industrial economy united in the Reich Chamber of Economics that the industrial economy during the war should be regarded as an economically interested party in the acquisition of enemy property. The reasons for this attitude are exclusively of an economic nature. Firstly, the acquisition of enemy property involves in most cases, especially in large, economically important objects, a great number of risks, necessitated by war economy, for any German enterprise coming into question for the acquisition. These risks, regarded from the standpoint of future economic returns, would render the acquisition in many respects a speculative matter, and for this reason alone, leading and serious undertakings of the German economy of themselves could manifest no economic interest in such acquisition during the war. Moreover, the relations and rights deriving from contracts must also be taken into consideration from the purely economic point of view in the execution of such liquidation measures, especially in view of the magnitude and importance of the objects which are often concerned. Such relations and rights frequently extend to neutral or friendly countries abroad, and cannot be threatened without grave economic disadvantages now, both national and political, in any eventual liquidation, and possibly to future economic developments. Primarily, however, the problem of a just sale which answers the requirements of political

economy of sequestrated property must be taken into consideration in the execution of liquidation measures for urgent reasons of importance to the total economy. The Reich Chamber of Economy believes itself to be in basic agreement with the Reich Government in considering that, in the execution of liquidation measures, neither a transfer into state ownership of these sometimes very considerable values, nor a planless transfer to private, and probably only by chance interested, parties, can be contemplated. A just solution from the point of view of political economy of this question would, however, meet with considerable difficulties during the war. The leading and important undertakings of the German domestic economy, therefore, do not intend, for the reasons given, to secure for themselves in Germany's present life and death struggle a private advantage in German and international competition by competing for enemy private property.

In order to exclude possible misinterpretations concerning the attitude of German industrial economy towards the purely economic side of this matter in the discussion of measures in this field, the Reich Chamber of Economics feels itself obliged to inform you, Sir, of this basic conception of the industrial economy and to ask you at the same time to take into account as far as possible the political-economic viewpoints described above,

as far as the political leadership of the Reich, for higher political reasons of which, as already mentioned, the Reich Chamber of Economics is not authorized to judge, may nevertheless consider it necessary

to authorize by decree the liquidation of enemy property as an administrative measure.

I have sent copies of this letter to the Reich Minister of Justice, the Reich Foreign Minister, the Reich Minister of Finance and The Reich Commissioner for Enemy Property.

Heil Hitler !
signed: A. PIETZSCH

Copy

The Manager of the
Reich Chamber of Economics.

Berlin NW 7, 4 November 1943
Neue Wilhelmstrasse 9/11

V 1544/43

To the

Reich Commissioner for Enemy Property
Attention: State Secretary Dr. KROHN

Berlin W. 8.
Mauerstr. 43

Re: Liquidation of Enemy Property.

Dear Sir, &

May I ask you to take cognizance of the attached copy of a letter which I addressed to the Reich Minister of Finance in the above matter.

Heil Hitler !
A. PIETZSCH

The letter of 3 November 1943 on the previous part of the Manager of the Reich Chamber of Economy to the Reich Commissioner for Enemy Property

- V 154/43 - and the attached enclosure are prepared from a copy
in the files of the former Reich Commissioner for Enemy Property.
They are with the Central Office for Property Administration
- British Zone - at Bad Hennigsdorf, Bahnhofstr. 9.

Berlin, 1 April 1948

signed: Dr. Konrad WARWICK

(Dr. Konrad WARWICK)

formerly Ministerialdirigent and
Deputy of the Reich Commissioner.

I herewith attest the above signature of Dr. Konrad WARWICK.,
Berlin-Friedenau, Rubenstrasse 50.

Berlin, 1 April 1948

signed: FELCHMAN

(FELCHMAN)

Attorney-at-Law

Defense Counsel at the Military Tribunals
at Moersdorf.

A f f i d a v i t .

I, the undersigned, former Attorney-at-Law and Notary, Fritz Ludwig of Berlin-Milkenberg, Siegburgerstr. 14, now at Herste, District Hoesster-Westfalen, have been warned that I shall be liable to punishment for making a false statement. I herewith declare under oath that my statement is true and was made in order to be submitted as evidence to Military Tribunal VI in the Palace of Justice at Nuremberg, Germany.

Until the capitulation I was legal adviser to the Bata-Konzern, in particular, to the Bata A.G. at Zlin - Czechoslovakia. Part of my work was to deal with all legal and economic problems which had to be settled between the Konzern and the German and Party authorities. During the whole time of the occupation of Czechoslovakia, the most important of these problems was to avert the danger of the seizure of Bata A.G. Zlin by the German authorities. The danger of the firm being seized and taken over by the German authorities was particularly great, because, on the one hand, the Bata Konzern was the largest and most interesting private enterprise in Czechoslovakia, and, on the other hand, the main shareholder of Bata A.G. Zlin, Dr. Jan A. Bata, was in South America during the occupation. This offered an easy and clear cut motive for a seizure.

At one time during the war, when the danger of the works being seized seemed particularly great - I cannot remember the exact date - the Administrative Council of Bata A.G. Zlin thought it would no longer be possible to keep the shares of the company in Czech hands. The question was discussed whether or not it would be better to transfer the shares voluntarily to a large German firm, whose reputation, commercial ethics, and loyalty, inspired confidence, than to hand over the management of the firm to Party officials.

In answer to my suggestion I was asked to start negotiations with Geheimrat Schmitz of the I.G. Farbenindustrie, whom I knew personally, to find out, whether the I.G. would be willing to take over the shares of Bata A.G. Zlin. In this way the wishes of the authorities and Party circles to secure German influence would be taken into account, and, on the other hand, one would succeed in getting this influence exercised not by the Party, but by the responsible men of a large German enterprise. At the same time it was hoped that an understanding in regard to the management of the firm could be reached more easily with these leading German personalities than with State and Party officials.

I therefore started negotiations in the building of the Deutsche Leanderbank in Berlin, with Attorney-at-Law Friedrich Silcher, Geheimrat Schmitz being temporarily absent. Attorney-at-Law Silcher asked me for some further details in regard to the firm of Bata and their interest in the chemical sector, but pointed out to me right from the start that the I.G. management would probably have scruples about giving its consent. He emphasized that the main interests of the Bata Konzern obviously did not lie in the chemical sector, and that one of I.G.'s principles, always upheld and observed, was not to expand in fields outside the chemical sector.

Attorney-at-Law Silcher passed on the suggestion of the Bata-Konzern submitted by me, to Geheimrat Schmitz, and informed me some time afterwards that at a meeting of the management, which had taken place in the meantime, it had been decided after due consideration, not to pursue the proposal any further; the I.G. management was of the opinion that only a part of Bata, and actually only a very small part, came within the I.G. sphere of activity, and they did not want to give up their old principle, not to expand their field of activity outside the chemical sector.

I had asked Attorney-at-Law Silcher to treat the negotiations confidentially, and I repeated that request when he informed me of the negative attitude of the I.G.

Herste, District Hoexter, 19 March 1948

signed: Fritz Ludwig

the

I herewith certify that/above signature is that of the former Attorney-at-Law and Notary Fritz Ludwig from Berlin-Wilmersdorf, Siegburgerstr.17, now at Herste, district Hoexter, whom I know personally.

Entered under No. 127 of the document register for 1948

Brakel, 22 March 1948

signed: Clemens Siarp.
Notary.

Seal: Clemens Siarp
Notary at Brakel
(District Hoexter)

Expenses:

Value card 2L art. 3 RM 3000.—

Fees paid 39 RM

RM 4.—

Turnover tax

RM 0.12

Total:

RM 4.12

signed: Siarp
Notary.

A F F I D A V I T .

I, Friedrich SELOHER, Attorney-at-law, living in Nuremberg,
Harrichstrasse 15, have been duly warned that I shall make myself
liable to punishment by making a false statement. I declare on my
oath that my statement is true and that it was made in order to be
submitted as evidence at the Military Tribunal VI in the Palace of
Justice in Nuremberg.

With reference to the affidavit of the former attorney-at-law and
notary public Fritz LUNING, which is in my hands, and which refers
to his negotiations with me on account of the Czechoslovakian Bata-
concern, I would like to state the following as a supplement:

The statements which were made by Herr Ludwig, Attorney-at-law,
at our first discussion concerning the chemical activities of the
Bata-concern, showed a magnitude and importance of these activi-
ties which surprised me, in particular with regard to the operations
in the chemical field which were carried out by the Bata-concern
itself. I pointed this out in an appropriate manner, when I for-
warded the inquiry to Herr Geheimrat Sehnitz. Being interested in
the matter, I inquired about it in our Mechanics Division and found
that Bata possessed a very considerable chemical department, which
was also confirmed by a discussion with industrial members of the
Vorstand, and that the management

of the I.G. was also well aware of this fact. Furthermore it was obvious, that anyway Bata was one of the most desirable and interesting objects in the whole of Europe, as far as magnitude, importance, technical efficiency, well-known good organization and working conditions, and also purely financial wealth were concerned.

The reason for the negative decision by the management of the I.G., as I was also informed, was that the I.G. did not want to participate more than absolutely necessary in the expansion of the German economy into the, up to then, independent industries of independent territories.

I attribute it to the confidential treatment of the matter, which naturally we promised and adhered to, and which is mentioned in the affidavit by Herr Ludwig, that scarcely anything seems to have been made known about these negotiations with Bata in a wider circle. Also within the I.G., hardly anybody who did not have to deal directly with the matter, has ever heard about it.

Nuremberg, 31 March 1948.

signed: Friedrich SILCHER

I, Dr. Rapprecht von Keller, certify that Herr Friedrich Silcher, Attorney-at-law, appended his above signature in my presence.

Nuremberg, 31 March 1948.

signed: Dr. R.V. KELLER

(Dr. R.V. KELLER)

CERTIFICATE OF TRANSLATION

8 May 1948

We,

BRIGITTE TURE,	ETO No. 35130,
VICTORIA ORTON,	ETO No. 30129,
ANNE MARTIN,	ETO No. 30144,
PATRICIA H.C. WOOD,	ETO No. 30139,
JULIUS STEUER,	AGO No. A-442654,
LEONARD J. LAWRENCE,	ETO No. 30138,
EUGENE R. KUN,	AGO No. D-429798,
BERYL C. REEWICK,	ETO No. 30133,

hereby certify, that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of Document Book 10 SCHWITZER.

VICTORIA ORTON,
ETO No. 30129,
Pages 4-10, 19-27, 54-55, 58-59.

BERYL C. REEWICK,
ETO No. 30133,
Pages 68-74, I-III.

PATRICIA H.C. WOOD,
ETO No. 30139,
Pages 28-32, 50-51, 85-90.

EUGENE R. KUN,
AGO No. D-429798,
Pages 62-67, 91-94, 103-104.

BRIGITTE TURE,
ETO No. 35130,
Pages 1-3, 75-77, 81-84, 100-102.

LEONARD J. LAWRENCE,
ETO No. 30138,
Pages 56-57.

JULIUS J. STEUER,
AGO No. A-442654,
Pages 50-53.

ANNE MARTIN,
ETO No. 30144,
Pages 11-16, 37-38.

Copy 39-49.

Walter Ludwig

Frankfurt am Main, 10 May 1948
Grillparzerstrasse 33

Affidavit.

I, Walter Ludwig, Frankfurt/Main - Eschersheim, Grillparzerstrasse 33, have been warned that I render myself liable to punishment by giving a false affidavit. I declare herewith on oath that my statement is true and was made to be submitted as evidence to the Military Tribunal No. VI at the Palace of Justice, Nuremberg, Germany.

From November 1912 onwards I was employed by Farbwerke vormals Meister Lucius & Brunck, Höchst am Main and, in 1925, was transferred to the I.G. Farbenindustrie Aktiengesellschaft, Frankfurt/Main. From the middle of 1927 until 1945 I was commercial Department Chief in the Sales and Sales Chemistry of I.G. Farbenindustrie Aktiengesellschaft, Frankfurt/Main and was directing Department L.

As far as the interests of I.G. Farbenindustrie Aktiengesellschaft were concerned I was also charged, from 1932 - 1945, by the Vorstand of I.G. Farbenindustrie Aktiengesellschaft with the supervision of the organization Vereinigte Sauerstoffwerke G.m.b.H. Berlin. I was therefore informed as to the renting, or rather the acquisition of the oxygenworks in Alsace-Lorraine. This decision was made at the time when Herr Weber-Andres, the member of the Vorstand responsible for commercial interests, was still alive.

Signed: Walter Ludwig

DOCUMENT BOOK XIII SCHMITZLER
SCHMITZLER DOCUMENT No. 213
Exh. No. 216

I certify herewith that the above signature is that of Herr
Wilhelm Ludwig, residing at Frankfurt am Main.

Frankfurt am Main, 15 May 1948

Signed: Dr. Walter BACHMANN
(Dr. Walter BACHMANN)

*Defense
Case 6*

DOCUMENT BOOK II

Supplementary volume to volumes I, II
and VI - IX

for

Dr. Georg von SCHWITZER

The Military Tribunal No. VI
in Case VI

submitted by:

Dr. Walter SIEBERS, Attorney-at-law
in Hamburg



INDEX

of Document Book No. XI, supplementary volume to
volumes I, II, VI - IX

for Dr. Georg von Schnitzler

Documents 193 - 218, pages 1 - 80

Schnitzler No.	Exhibit No.	Description of document	Page
<u>Re: Utilization of the economic resources of the occupied territories (Document Books VI - VIII)</u>			
193		Reparation - Social product - Standard of living, attempt to balance the economy, by a commission under Senator G.W. Harmsen by order of the Minister Presidents of the Bizone dated November 1947, concerning: a. Dismantling b. Services rendered by Germany to the Allies up to date. c. 1st and 2nd industrial plan (approx. 177 billion Marks & approx. 71 billion dollars)	1-15
194		Affidavit of Hermann Bueh with order form of the British Armed Forces. In accordance with this form blue prints were confiscated and taken abroad.	16-21
195		"German property in Sweden", from "Trade Journal" of 11 March 1948 "Aftenbladet" demands a revision of present agreements. The sale of confiscated German property in Sweden so far brought 215 million Swedish crowns.	22-25

DOCUMENT BOOK XI SCHNITZLER

Schnitzler No.	Exhibit No.	Description of document	Page
Res: Aggressive War (Document Books I and II).			
196		Affidavit of Hans von Hauner, Retired Reich Minister. Appointment of Schnitzler as German Commis- sioner General for the World Exhibition in Barcelona by Foreign Minister Stresemann, cosmopolitan attitude of I.G. Rejection of National Socialism.	26-28
197		Affidavit of Wilhelm Zengen, former Director General of Mannesmann and honorary leader of the Reich Group Industry, re Schnitzler's activities with in the Reich Group, particularly as chairman of the Com- mittee for Exhibitions and Fairs, and the Committee for Industrial Commercial Adver- tising, also German-English negotiations in March 1939.	29-35
198		Affidavit of Dr. Felix Ehrmann, Economic Group Chemical Industry and Reich Office Chemistry, now Chief Manager of the Economic Association Chemical Industry, British occupied Zone.	34-36
199		Affidavit of Fritz Fischer-Jane, Department Chief of the Advertising Depart- ment of I.G. Position and activity of Schnitzler in the Committee for Exhibitions and Fairs, in the Committee Industrial Commercial Advertising, on the Advertisement Council, and as a mem- ber of the Aufsichtsrat of the Ala-Anzeiger A.G. (Advertising Company).	37-44
204		Affidavit of Erich Imoller, Employee of the Department for Economic Po- licy of I.G. in Berlin (Wipo) about bad re- lations between I.G. and Nazi organizations abroad.	45-46
205		Affidavit of Dr. Guenther Frank-Pahle about the Company for the Promotion of Sales and negative attitude of I.G. towards counter-espionage.	47-50

DOCUMENT BOOK XI SCHNITZLER

Schnitzler No.	Exhibit No.	Description of document	Page
206		Affidavit of Erwin Kritzer, Chief of the Economic Secretariat of Secret Councillor (Geheimrat) Duisberg. Jesco von Puttkammer had been instructed by Geheimrat Duisberg to write the latter's memoirs. He was not an employee of I.G. 51-52	
207		Affidavit of Kurt Nadolski, Chief of the Personnel Department of the Farbenfabrik Bayer, Leverkusen. Jesco von Puttkammer was not in the ser- vice of I.G. either as an employee or as a worker. 53	
208		Affidavit of Herbert Boldt, formerly of the Reich Ministry of Economy, now Ministerial Councillor in the Admini- stration Office for Transportation. The appointment as Military Economic Leader by the Reich Minister of Economy is merely a distinction, and not connected with any particular activity. 54-55	
<u>Re. Schnitzler's person (Doc. Book II)</u>			
209		Affidavit by Ella Rosengart-Schnitzler: Schnitzler supported the Jewish physician Dr. Rosengart, for whom he secured a job with I.G. 56-57	
210		Affidavit of Dr. Reinhard Goldberg, Chief of the Office of Sparte I. Through his activities Dr. Goldberg had particularly close connections with Dr. Mueller-Cunradi, who had nothing to do with the Auschwitz plant but who was in charge of of the establishment of the Heydebrock plant. "Dr. Mueller-Cunradi never once mentioned any- thing to me about gassings in Auschwitz or about the use of gases produced by I.G. for the purpose of gassing people in Auschwitz." 58-60	
211		Affidavit of Wilhelm Bormann, Deputy Chief of the Personnel Department of I.G. in Frankfurt, re Schnitzler's atti- tude in personnel problems, particularly with regard to Party demands, and towards the foreign workers employed with I.G. in Frankfurt. 61-63	

DOCUMENT BOOK XI SCHNITZLER

Schnitzler No.	Exhibit No.	Description of document	Page
214		Affidavit of Richard von Szilvinyi, son-in-law of the Aufsichtsrat Member Carl von Weinberg, re the efforts of I.G. to protect Geheimrat Dr. Arthur v. Weinberg who, being Jewish, had been deported to Theresienstadt.	64-66
215		Affidavit of Richard von Szilvinyi, re the attitude of I.G. towards the two gentlemen von Weinberg (see also Kugler exhibits No. 4 and 23)	67-68
216		Affidavit of Richard von Szilvinyi, re Schnitzler's person.	69-72
217		Affidavit of Hermann Mohr, re good treatment of the foreign war- kers employed with I.G. Frankfurt.	73-75
218		Joint affidavit in favor of the defendant v. Schnitzler made by 29 of his former subordinates.	76-80
219		Affidavit of Wilhelm Doering -- re Reich Group Industry.	81-83

I, Dr. Walter S i e m e r s , attorney-at-law in Hamburg,
presently defense counsel with the American Military Tribunal Nuremberg,
hereby certify that the attached extracts were copied word for word
from

Reparations,

The Products of Social Organization,

The Standard of Living

An Attempt to draw up an Economic Balance Sheet,
by a Commission under the direction of

Senator G. W. Hornussen,

by order of the Ministers President of Saxonia,

November 1947.

Friedrich Trujen Verlag (Publishers), Bremen

Nuernberg, 23 April 1948

(Dr. Siemers)

Excerpt from

Reparations
The Products of Social Organization,
The Standard of Living
An Attempt to Draw up an Economic Balance Sheet,
by a Commission under the direction of
Senator G. H. Harnsen,

by order of the Minister-President of Bremen,
November 1947.

Friedrich Trujon Verlag (Publishers), Bremen.

* * * * *

P. 65-67

X. Dismantling and Evaluation of the Removals.

* * * * *

In the beginning the Control Council had promulgated for all the zones uniform regulations through the Directorates of the Department for Reparations and Restitution Deliveries. In the meantime there have been deviations in the practice of dismantling. It appears that only in the western zones were the evaluation methods developed to a reasonable extent on the basis of the first regulations of the Control Council. In important particulars it constitutes today a frequently modified, highly complicated system of evaluation principles of which the ultimate outcome is to place a very one-sided burden on the debtor nation and which cannot serve as a foundation. The German nation must look on while installations which are of value to it are taken away from it without being able to take any steps to ensure that

- 2 -

the installations will be credited to it in the reparations account to an extent at least commensurate with their approximate operational value. This could have been avoided had the rule been upheld which were originally established for the U.S. zone and certainly were in accordance with the general fundamentals of law since it provides for each reparations contribution made a counter value must be put down which is computable to the coin. This obligation for the determination of values was given expression in the regulation to the effect that no object which is to be dismantled can be put down for less than 40% of the 1938 price. This rule, however, which would have forestalled the worst was relaxed for the U.S. Zone itself, to be ultimately abolished while no attention was ever paid to it in the other zones.

The standards valid in Germany for the evaluation of a real value are laid down in the Commercial Code in the regulations for the preparation of balance sheets. According to these standards, all entries on the asset side of the balance sheet are to be calculated on the property value which could be obtained if the object were to be sold. In the case of reparations, however, the enterprise of which the installations form a part is not to be sold but is generally to be taken away. It is for this reason that, in establishing this value of the installation for reparations purposes, one should not take as a basis a selling price which by reason of circumstances is an abnormally reduced price; the value really to be considered should only be an estimate according to the profits of the establishments. In contrast herewith the Allies, in their evaluation method, obviously proceed as if they were concerned with establishing sales values. The evaluation criteria such as purchase value, utilization value, depreciation quota thus being applied in a manner which, for Germany, is detrimentally one sided.

- 3 -

- 3 -

To give an example:

Inasmuch as the creditors demand of the debtor that he establish the original purchase value of the installation which is to be dismantled by producing the original bills- which as a result of the effects and consequences of the war it is impossible to obtain- the evaluation is made on the basis of weights: "The value per ton of installation property in 1938". In such a manner engines of the most diverse construction, the simple types and high priced types, irrespective of age, are all being treated alike with the result that - to give an example - an average price of 1,664 RM per ton is established for drilling machines, which price also finds application for ordinary bench drills whose purchase value was 2,500 RM per ton, as well as for expensive template boring machines and multiple spindle boring machines which cost up to 12,000 and 14,000 RM per ton, there also being no difference made whether the machine was built in 1920 or in 1944. For the German machine production and its highly developed differentiation methods no single average value can not be applied, rather is it necessary to cover each object individually. From this English evaluation method which deals with average values based on weight, and with certain depreciation rates applied according to an average number of utilization years it follows that for the installations of the iron and steel industry, of the chemical industry, of the engineering industry, and of the metal processing industry, which are being primarily considered for reparation purposes, the average life acknowledged is 15 to 16 years. From this taken in conjunction with the depreciation due to war damage and greater strain during

- 4 -

the war, it follows that all the installations built before 1930 are to be written down to 0.- RM owing to depreciation. With the application of this method it was found in one plant that more than one third of all of the installation parts earmarked for dismantling - among them 740 machine tools - were evaluated at 0 RM because of superannuation while according to the original evaluation method, had it had been retained - 40% of the prices of 1938 - they would have constituted a residual value of 3 million RM. The creditor acquires in such fashion ownership of installations which on the reparations account do not appear at all or only as fractions while for the debtor they would have had a much higher effective value and have been a very considerable production factor. Why then are machines the value of which is evaluated at nil ~~and~~ which, as machines, are being considered as of no value, being dismantled at all for reparation purposes?

The slipways (Hellinge) of A.G. "Geser", Bremen, for example, which are somewhat older than 35 years and are being dismantled on behalf of the Soviet Union are estimated to have a value of RM 0.- when applying the depreciation rates of 3.7% per year. According to the German depreciation rates (2%) the establishment would not have been worked down to a value of RM 0.- until 1962. The dismantling costs will amount to 920,000 RM, charged against the German economy, while the installation is being delivered to the creditor Soviet Russia free of charge. Not even the scrap value of 69,000 RM is being credited. To build new slipways, taking the prices of 1938 as a basis, would cost 832,000 RM, expressed in a price evaluation of today this is only one third more, approximately, than the cost of dismantling. Were one to blast the slipway whose iron structure after dismantling will be fit for use at all, hardly

would at least have saved the cost of dismantling.

The Krupp Steel Works Berbeck represent an acquisition value of 210 million RM. According to the English evaluation method it is being credited to the reparations account with 10 million RM.

.....

The costs of dismantling serve to demonstrate the dubiousness of the evaluation of the dismantled objects. Because of the very fact that the evaluation and the cost of dismantling are grossly incongruous and because they burden the state budget to an extraordinary degree they should be credited to the reparations account. The work of dismantling is directly connected with the reparations and is an integral part of it. The expenditure for the dismantling and shipping of industrial installations includes, among other things, wages and social benefits for the workers who do the dismantling, packing and shipping of the reparation articles, and the preparation of construction drawings. The cost per ton of dismantled material amounts to approx. 210 RM for foundries, to 477 RM for machine tools, to 800 to 900 RM for plant shops and steel structures. On the average, the cost of dismantling may amount to from 1 1/2 to twice the "residual" value of the reparation property to be dismantled. Taking 5,5 billions of Reichsmarks, in prices of 1936, as the "residual" value, the cost of dismantling amounts to 8 to 11 billion Reichsmarks. The expenditure for dismantling thus comes very close to the value which the substance already

dismantled and that which is earmarked for dismantling represents for the national economy, a value, based on the prices of 1936, is estimated to amount to 11 billion reichsmarks. 28)

28) refer to Appendix XII

Appendix XII

Germany Lelivates up to the present for
the benefit of the Allies.

..... 9. Summarizing that which Germany has so far provided.

When undertaking to compile a list of what Germany has so far contributed for the benefit of the Allies, segregation into four main categories is advisable:

	billions of RM	billions of RM
1. <u>Withdrew from German national assets held by</u> <u>Germans at home.</u>		
a) German credits abroad	9.75	3.9
b) value to the national economy of the territories cut off	70.0	28.0
c) dismantling and signing over of property	12.5	5.0
d) compulsory export of wood	1.0	0.4
e) funds derived from levies on tax payments in the "eastern Zone, for camouflaged reparations 1)	4.5	1.8
f) losses inflicted upon public property 2)	1.0	0.4
g) German gold stocks turned over	0.75	0.3
h) sea- and inland navigation vessels turned over:	0.5	0.2
	<u>100.035</u>	<u>40.0</u>

- 7 -

	billions of RM	billions of RM
brought forward	100,0	40,0
2. <u>Derived from current Production</u>		
a) <u>Reparations from current production</u>		
of goods 4)	5.0	2.0
b) Compulsory export of coal	0.5	0.2
c) Funds derived from levies on tax payments, in the "Eastern Zone, for camouflaged reparations 1)	4.5	1.8
	10.0	4.0
3. <u>Other contributions</u>		
a) Value of German patents industrial secret, data, etc.	12.5	5.0
b) Work of prisoners of war	5.0	2.0
c) Cost of dismantling	8.0	3.2
d) Losses through "currency manipulations"	1.75	0.7
	27.25	10.9
4. <u>Property losses of ethnic Germans expelled from foreign countries</u>	40.5	15.2
	177.75	71.1

1) Because of the matters of raising money the items under
1c and 2c go together; no information is available as to how they are
being applied. It may be assumed that they are being utilized, in part,
for the purchase of objects belonging to the bulk of the national
assets, in part for the acquisition of products from current production.

2) Rail systems dismantled in the "Eastern Zone, libraries, etc.
not including art treasures.

3) The total amount of 100 billion Reichsmarks to cover that which
has been withdrawn from German national property is increased by an
equal figure of 100 billion Reichsmarks to cover estimated war damage
for the remaining territory

- 8 -

- 7a -

(compare appendix V as per page 8) which brings the total losses to 200 billion reichsmarks; this is substantiated by other sources (in appendix V, page 33).

4) withdrawn by the occupation authorities in the Soviet and French Zones of Occupation. The value of the German personnel working for Soviet Stock corporations in the East Zone as well as their consumption of raw materials produced by the home industry.

This amount of 71 billion dollars, or 178 billion reichsmarks, the greater part of which is expressed in prices as of 1936) is the total of the values which were

- 8a -

- 8 -

signed over to the Allies from national assets in Germany, proper values in terms of services rendered, and property left behind by expelled ethnic Germans. For the reparations debtor who has not yet been able to discuss with the creditors what the sum total of his obligations is but who, since the capitulation, sees himself exposed to serious interference in matters involving the substance of his national economy it is a duty which he cannot shun, to determine for himself how much his efficiency has been reduced thereby. In the last analysis this is the boundary line set for the creditor when proceeding to establish and collect his claims. ^{if the} Question of reparations at last is to be raised to ^{a place} place of justice.

- - - - -

P. 98:

THE FIRST AND SECOND INDUSTRIAL PLAN

German text based on the announcements of the Allied
Control Agencies.

A. PLAN for Reparations and the Postwar Level of German
Economy, in accordance with the decisions made at the
Conference in Berlin, on 28 March 1946.

I. According to the Berlin Agreement the Allied Control Council is to determine the magnitude and the character of the principal industries' equipment which is not required for Germany's peacetime economy and, consequently, is available for reparation purposes.

The basic principles for the plan covering the reparations and the postwar level of the German economy

- 9 -

- 9 -

according to the Berlin Conference are as follows:

- a) Destruction of the German war potential and the industrial disarmament of Germany;
- b) Payment of reparations to countries which suffered damages as a result of German aggression;
- c) Development of agriculture and of peacetime industry;
- d) Maintaining an average standard of living in Germany which will not exceed the average standard of living of European countries (with the exception of the United Kingdom and the Socialist Republics of Soviet Russia);
- e) Leaving means to Germany which after the payment of reparations will be adequate to enable her to exist without the assistance from outside.

II. Commensurate with these principles, the principal elements of the plan were agreed upon the basis of the following hypotheses:

- a) that the population of Germany will amount to 66.5 million persons after the war;
- b) that Germany will be considered as one single economic entity, and
- c) that Germany's export trade will have access to international markets.

Branches of Industry which are forbidden.

III. By reason of the destruction of the German war potential the production of war weapons, war equipment and means for waging war, as well as the manufacture of airplanes and sea-going vessels of all types are forbidden and such production will be prevented.

- 10 -

IV. The entire capital equipment vested in the manufacture of the following types of products is to be withdrawn:

- a) synthetic benzines and oils,
- b) synthetic rubber,
- c) synthetic ammonia,
- d) ball and roller and cone bearings,
- e) certain types of heavy machine tools,
- f) heavy tractors,
- g) raw aluminium,
- h) magnesium,
- i) beryllium,
- j) vanadium from "Thomas" slag,
- k) radioactive materials,
- l) hydrogen peroxide of more than 50%,
- m) specific war chemicals and gases,
- n) radio equipment.

In order to meet home market requirements, equipment for the manufacture of synthetic benzine and oils and ammonia and rubber, as well as of ball and roller and cone bearings, will not be removed until the necessary imports can be effected and paid for.

Restricted branches of industry.

.....

Page 97-98:

- B. Revised plan of 26 August 1947 concerning the industrial level in the British and American Zones of Germany.

Preamble.

In March 1946 the Allied Control Council representing the four Occupying Powers authorized a plan regarding reparations and the level of German post-war economy.

- 11 -

The object of this plan was to eliminate the German war potential, to provide for reparation deliveries, and still to allow for enough factories and industrial equipment to remain within Germany to render possible the rebuilding of a prosperous peace economy.

Experience has shown the necessity of revision of this plan which assumed certain conditions which, however, have not been met. Neither the bizonal territories nor Germany as a whole could regain a healthy economic status under the plan in its present form, since Germany is unable under prevailing conditions to contribute its indispensable share in the economic rehabilitation of Europe.

The revised plan has the same object in view as the original plan.

The necessity of providing for the eventual incorporation of the bizonal plan into a plan for the whole of Germany, has been kept in view throughout. The offer to the other Occupying Powers to join the Bizone in the creation of a uniform German economy, continues to hold good. The plan was drawn up with express regard to the hope of the ultimate acceptance of this offer.

I. General considerations.

Germany's industrial capacity according to the plan of March 1946 provided for an estimated production of 55% of the 1938 level, i.e. about 70 - 75% of the 1936 output. The new plan will in effect result in the maintenance by the bizonal

- 12 -

- 12 -

area of a capacity equal to that of the German industrial level of 1936, i.e. of a year which was neither conspicuous by high prosperity nor by particularly critical conditions.

- a) The original plan provided for extensive reductions in the production capacity of the metal, machinery, and chemical industries out of which the major share of the reparations was to be extracted. It is impossible to give Bizonia a self supporting economy without increasing considerably the level of these industries.

Essentially the whole difference between the original plan and the revised one lies in these reparation industries, since the original plan already provided for ceilings for non-reparation industries which in some cases were wholly unrealistic.

Under the revised plan the capacities of the metal, machinery and chemical industries will suffice to permit of a production of but 5-10% below the 1936 level. In comparison with the war year of 1944 the estimated levels represent a reduction of 55-60%.

- b) In this connection one has to consider that the bizonal population already numbers 6 million more than in 1936 and that it is expected in 1952 to surpass its pre-war size by 8-10 millions.

- 13 -

- 13 -

On the basis of an expected population in Bizonia in 1952 of 42-44 millions, the production capacity provided for under the new plan would amount per head to approximately 75% of the 1936 level.

- c) Prime requirement in elaborating the bizonal plan was to ensure the industrial level necessary for the self-support of the territory. Thus for instance when fixing the level of the steel and machine industry, there were taken into account the requirements in respect of exports, bizonal home demands and trade with the rest of Germany. When estimating the requirements concerning trade with the rest of Germany and imports, dismantlings of essential industrial equipment in other zones as well as in Berlin had to be taken into consideration.

The production potential of certain industries therefore allows for trade requirements in respect of the rest of Germany, and capacities provided for this purpose represent Bizonia requirements. In other words: In order to maintain itself, Bizonia has to procure those products which it lacks, either through imports from abroad or by way of trade from other parts of Germany.

II. Requirements of a balanced economy.

Bizonia, in addition to the pre-war trade and in excess of its internal requirements, has to produce a surplus for the trade with the rest of Germany. This makes special

- 14 -

- 14 -

demands on the industrial capacity of the steel
production and its by-products which are most urgently
required. They represent the most reliable barter
goods which are required by the rest of Germany in
exchange of products vital to the Bizania's economic
structure.

.....

- 15 -

DOCUMENT BOOK II SCHNITZER No. 194
EXHIBIT No.

I, Dr. Walter Siemers, Attorney-at-Law, Hamburg,
at present Defense Counsel before the American
Military Tribunal at Nuernberg, hereby certify that the
attached document:

Affidavit dated 22 September 1937 by Hermann Buch,
is a true and correct copy of the original which
was submitted to Military Tribunal IV by the Defense
in Case V (Flick trial) as Weiss Doc. No. 1257 and
accepted by the Military Tribunal as Exhibit No. 180.

Nuernberg, 30 April 1948

signed: (Dr. Siemers).

Teiss (Flick) Doc. No. 1257
Exhibit No. 180

AFFIDAVIT

I, Hermann BUCH, born on 25 June 1894, residing in Dahlbruch/Westphalia, Wittgensteinerstrasse 24, have at first had my attention drawn to the fact that I make myself liable to punishment if I submit a false affidavit. I declare under oath that my statement is true and was made in order to be submitted as evidence to Allied or German Courts or authorities.

Since the 1st of December 1934 I have been working for the Siemag, Siegerer Maschinenbau-Aktiengesellschaft, first as Senior engineer until 31 December 1935 and from that period on as a technical director. During the time of May 1946 till April 1947 the British Military Government confiscated at the Siemag ground plans and construction plans for the machines and installations listed in the attached table.

As a spiritual possession of the Siemag, these plans represent great values for this enterprise, since they represent the results of technical research and practical experiences gathered through many decades. For this reason the Siemag would not have given up voluntarily these documents nor would they have sold them without at the same time delivering the installations themselves.

So far no payment has been made for these plans. Neither have the responsible authorities

DOCUMENT BOOK II SCHNITSLER No. 194
EXHIBIT No.

- 2 -

acknowledged the Siemens's claim resulting from that confiscation, which would, under normal circumstances constitute the counter value of the plans.

The attached photostatic copies of the documents of confiscation (21 Army Group Form 80 and "T" Form 4) are identical with the originals. The form of the "T" Form is without signature nor stamp. The receipt of the drafts was confirmed upon request.

(signature): Hermann Bach

Document Roll 245 year 1947

Hilchenbach, 22 September 1947.

The above signature of the technical director Hermann Bach residing at Dahlbruch/Westphalia, Wittgensteinstrasse 24, is herewith certified.

Signature (illegible)

Notary

Statement

Value 3,000 RM

Fee article 52 RKO 4.-- RM

Fee article 39 RKO 4.-- RM

8.-- RM

Signature (illegible)

Notary

- 18 -

DOCUMENT BOOK XI SCHNITZLER No. 194
EXHIBIT No.

- 3 -

Compilation attached to the affidavit dated 22 September

1947 Direktor Hermann Buch.

Diagrams concerning the location resp. construction of the following installations and machines were confiscated at the Siemens:

- 1) Trio - blooming mill 'C';
- 2) Garret - reel toppel system;
- 3) Garret - reel disk system;
- 4) Edenborn reel;
- 5) mechanical thermal processing installation;
- 6) " " " " " " ; Grid and roller system;
- 7) longitudinal shears;
- 8) straightening and cutting plant;
- 9) roller drive cutting plant;
- 10) quarto reversing cold-rolling mill;
- 11) 'Kontl' and finishing mill A;
- 12) rotary cropping shears;
- 13) " dividing " ;
- 14) wide-flanged girder scaffold;
- 15) bloom and medium iron rolling train;
- 16) band reel changer;
- 17) winding drum with hydraulic drive;
- 18) quadruple cold-rolling mill 165/375 Ø;
- 19) dual cold-rolling mill 350/500 Ø;
- 20) quadruple cold-rolling mill 250/650 Ø;
- 21) treble cold sheet metal plant;
- 22) quadruple warm scaffold;
- 23) warm bloom shears;
- 24) propelling shears;
- 25) separating shears;
- 26) sheet metal guillotine SZ 8;
- 27) roller straightening machine RPF 95;
- 28) " " " RPF 26;
- 29) leverage punching machine;
- 30) rolling mill with 20 rollers.

(There follows: "British Occupying Forces requisitioning form".)

BRITISH FORCES DEMAND FORM / BESTELLUNGSFORMULAR DER BRITISCHEN STREITKRAEFTE

A. PROCUREMENT
ANFORDERUNGTO **Stabschef/Leutnant of Bahlbrunn**Demand No.
Anforderung Nr. **2006/ 1399**By **Stabschef**
To be delivered to
Anforderung an **Stabschef, 3108 Trip No 1402
APO Box No 118**Demanded by **R.J. Barber.**

Angefordert durch

Rank **Colonel**

Dienstgrad

Appt

Dienststellung

Unit

Truppenkörper

1 Corps District

Procurement Authority Card No.

Vollmachtkarte Nr.

Suppliers Name

Name des Lieferanten

Suppliers Address

Unterchrift des Lieferanten

Signature of Suppliers

Unterchrift des Lieferanten

Code No (e) **11/1/3**

Code Nr.

Sheet No

Blatt Nr.

No. of Sheets

Anzahl der Blätter

Date

Datum

7 May 46

Approved (f)

Date of Approval

D.D.O.S.**7 MAY 1946****REF****1 CORPS**Quantity / Service Required (4)
Angeforderte Menge/DienstMetric Measure
Metrische MasseDemand No. **2006**

(2)

Unit
EinheitRequired
AngefordertReceived
ErhaltenDemanded
AngefordertReceived
ErhaltenDate
Datum

(8)

(9)

Description of Goods

(See also Annex)

459.861 KM**Total 459.861 KM**The undersigned warrants on Army Reserve
The undersigned warrants on Verfügung gestelltSignature of Procurement Officer
Unterschrift des beschaffenden OffiziersRank **Colonel**
DienstgradAppointment
Dienststellung**3108 1 Corp's Dist.**

B. COMPLIANCE CERTIFICATE

1. CERTIFIED that the services detailed in notes (1) have been satisfactorily carried out. (1)
Zertifiziert, dass die in Spalte (1) beschriebenen Dienstleistungen befriedigend ausgeführt worden sind.
2. CERTIFIED that the goods detailed in notes (2) and (4) have been received and are up to specification. (2)
Zertifiziert, dass die in Spalte (2) und (4) beschriebenen Waren geliefert worden sind, und dass sie der Spezifikation entsprechen.
3. CERTIFIED that satisfactory delivery performance will be made as delivery performance is certified from time to time. (3)
Zertifiziert, dass befriedigende Waren/Lieferleistungen werden auch Vorlage der von mir gegebenen Lieferungs-/Leistungsbestätigung von Zeit zu Zeit gemacht.

Signature of Procurement Officer
Unterschrift des beschaffenden OffiziersRank **Major**
DienstgradUnit
Truppenkörper**1st Lt 1 Force Unit**D. PAYMENT
ZAHLUNGTo be completed by Kriegswirtschaftsstellungsbehörde
Von der Kriegswirtschaftsstellungsbehörde auszufüllen

Amount Authorized

Genehmigter Betrag

Signature of Authorizing Official

Unterschrift des genehmigenden Beamten

Control List No.

Anzahlungsliste Nr.

E.

To be completed by the paying Kasse
Von der Auszahlungskasse auszufüllen

Date of Payment

Auszahlungsdatum

Ledger Reference in Kassen books

Kassenbuch Nr.

Signature of Kassen Official

Unterschrift des Kassenbeamten

(1) <u>TEAM LEADER</u>			BIOS Trip No.
(2) <u>ADDRESS</u> to which documents should be evacuated By "T" Force for onward transmission to Naval Base, Suez Route 160 SUEZ to APO 757			Serial No. 300/2651
(3) <u>TARGET</u> Name SIGMA Address SIGMA			
(4) <u>DESCRIPTION OF DOCUMENT</u>			Originals or copies
Item	Type	Title or other Description including author	
		Mechanical drawings of Rehm Rolling mill manufactured by the above mentioned firm. Drawings of assembly, sub-assembly and detailed parts of the subject rolling mill	

To :- Mr Scott.

I would greatly appreciate it if you would explain to Mr HEU DORF that he will be in order in preparing and sending to "T" Force the documents called for above.

Kind regards
Rufus Morris
Officer.

I, Dr. Walter Siemere, Lawyer in Hamburg, at present defense
counsel with the American Military Tribunal in Muernberg, certify
herewith that the ensuing article:

"German Properties in Sweden"

from the newspaper "Dankesblatt" No. 11 of 11 March 1948, is a
true and correct copy.

Muernberg, 23 April 1948

(Dr. Siemere)

Excerpt from:

Issue 11 of the "Handelsblatt" of 11 March 1948;

GERMAN PROPERTY IN SWEDEN

"Aftonbladet" demands revision of existing agreements.

To date the disposal of confiscated German property in Sweden has realized 215 million Kronas which were placed into the Swedish-German clearing account. After liquidation of those German assets which have not been sold as yet, a total yield of 370 million Kronas is expected. By agreement with the Office dealing with the migration of capital to foreign markets the city of Stockholm has acquired the German legation building in Stockholm for 1.5 million Kronas, with the right to possession to 1 January 1953.

An article in the well-known Swedish paper "Aftonbladet" points out the negative effects of the measures taken by foreign countries against German property. The paper criticizes in particular Sweden's willingness as a non-belligerent power to carry out measures decided on by the Allies, and compares by way of contrast the reserved attitude of Switzerland in this respect. More particularly "Aftonbladet" states:

"During the final stages of the war the Allied Powers regarded as their prime task the prevention for all future of a new German attack. Their mode of action was determined by this point of view, and consequently Germany was turned into an economic desert and a political vacuum. Today's attitude is entirely different. It has become evident that without Germany Europe's economy cannot function; thus the prime task at present is the economic revival of Germany.

- 2 -

On examining and discussing the steps necessary for this, one meets difficulties everywhere because of the altogether contrary policy pursued at first. This, though to a lesser degree, applies to Sweden, where German property was confiscated and, with disastrous consequences for the German owner, was sold and by reason of which now, when an attempt is being made to restore normal trade connections in and about Germany, increased difficulties arise. Even in countries which had been dragged into the war, such as Norway, the measures against German property are now being criticized and it is pointed out that they violate the principle, that private property is to be protected even during time of war. In the case of Sweden the criticism is stronger because there the German property could not at least formally be termed enemy property as in Norway or England.

Swedish laws in 1945 were in agreement with the program of the Allies of Bretton Woods in 1944. Consequently German property in Sweden was listed, prohibition of sale was issued and it was subjected to administration. The value of this property was estimated at 375 million Kr. In accordance with the Washington agreement of July 1944 the liquidation was done systematically in order in this way to turn property into money, which was then put into the German-Swedish account. Principally this concerns German property which is being administered in its national budget. Under present conditions however one cannot speak of a protection of the rights of the individual. Business connections were destroyed and losses suffered. For this Sweden is being held responsible not only by the Germans but also by people in other countries who, by these methods, might suffer indirectly.

- 24 -

- 3 -

Switzerland ~~was~~ to come to the same agreements, is said to have worked with much more reserve in this case and will probably in future be able to reap the fruits of its reservation. Sweden which, after the war, showed a less lucky hand in its diplomacy does not know what to do. It is time, however, for this whole question to be subjected to new judgment. This matter is closely connected with the present day international economic problem, which must somehow be faced.

- 25 -

A f f i d a v i t .

I, Hans von Raumer, born on 10 January 1870 in Lessau, Reich Minister retired, domiciled in Laetzingen, Postal District Schaffhausen, Wuerth., have been warned that I render myself liable to punishment by making a false affidavit. I declare on oath that my statements are the truth and were made to be submitted as evidence to Military Tribunal No. VI in the Palace of Justice, Nuernberg, Germany.

Accordingly in the proceedings before the American Military Tribunal at Nuernberg against the former member of the Vorstand of the I.G. Farben, Dr. Georg von Schnitzler, I make the following statements:

I have known Herr von Schnitzler since the early twenties and like almost all other leading members of German Industry I met him frequently on matters of political economy as well as in society. He was one of those leading economists who knew particularly well how to establish connections with foreign countries. He was internationally minded in keeping ^{with} the spirit of his company. He was anything but a nationalist. To him it was a matter of course that the progress of humanity and also the progress of Germany could be reached only by the close cooperation of the nations, by exchange of experience and by common work on the problems of scientific and technical progress. This widely known attitude caused the then foreign minister Stresemann, in 1929 to give him the position of German commissioner general for the world exhibition in Barcelona. He fulfilled this job splendidly. To what extent international cooperation was a matter of conviction for him was shown when he

had to plead in the budget committee of the Reichstag, in which I represented the Deutsche Volkspartei faction for this question, for the authorisation of Reich credits for this exhibition. Seldom has the Reichstag heard a plea for the necessity of international cooperation spoken so much out of innermost conviction.

I was a good acquaintance and friend to the politically leading and authoritative members of the administration of the I.G. Farben, Carl Bosch and Dr. Kalle. They were the strongest opponents of National Socialism and could imagine, of its ideology and its methods. Dr. van Schnitzler shared this conviction. Again and again the question arises, why did not these opponents of national socialism resign from their jobs in 1933 so that they would not be forced into cooperation. But what was the actual position? It was most authentically characterized by the former Reich chancellor Dr. Heinrich Brüning in his lecture "The statesman", delivered in the University of Chicago and published by the Chicago University Press, where, by the finest witness for the development at the time, it is stated, that in moment of the assumption of power the best informed economists were agreed on the fact that Hitler's regime would have to break down as early as in 1934 owing to a lack of foreign currency. Unexpected developments prevented the realization of this expectation, an error made not only by German but also by leading foreign personalities. So one could not possibly expect any of the men who, in 1933, stood at the head of the great industrial enterprises to leave his post because of his objection to national socialism. For they were responsible not only towards the shareholders, but towards the whole of the people -

- 3 -

In the case of the I.G. Farben one might say towards the world, which was dependent on the products, the achievements and the progress symbolized by this company. Men who had left their country at such a time would have been likened to captains who leave their ship if a storm threatens. But in this staying the decision had been made for these men. Soon their actions were no longer free, but were subject to an unescapable compulsion. Their economic work was determined by the dictates of political offices. To act against these orders or to rebel against them not only meant certain death, but also endangered, as a result of the principle of family responsibility which with every year was more strictly enforced the families of those concerned. Everything that occurred after 30 June 1934 happened under direct duress.

Just like Carl Bosch, who finally broke down in this conflict, so also was Herr von Schnitzler subject to this force. I was able to perceive, on all occasions whenever I met him after 1933, that his ideas were not national socialist.

I myself, because I refused the requests for political co-operation addressed to me by Goering and Goebbels, was in 1933 removed from my undersigned life job, as being "politically unacceptable" and robbed of ~~my position~~ by the National Socialists.

Laetzingen, 27 April 1948.

signed: Hans von Raumer
Reich Minister retired

The signature of the Reich Minister (retired) Hans von Raumer is hereby certified.

Laetzingen, 27 April 1948

The Major

Seal: The Majors

signed: A. K l o t z

office Coat of arms

Community of Laetzingen, district Boeblingen.

- 28 -

- f f i d a v i t
- - - - -

I, Wilhelm L u n g e n , born 30 September 1891, residing in Lucaseldorf, Cecilienallee 6/8, know that I shall render myself liable to punishment by making a false affidavit. I declare on oath that my statements are the truth to the best of my knowledge and belief and were made to be submitted as evidence to the Military Tribunal in Kuerstberg.

1. From end of 1936 until 1945 I was honorary head of the Reich group industry. Insofar as I make statements in the following on events which happened prior to 1936 I base them on information passed to me from reliable sources, and for events after 1936 on my own observations.

2. The Reich group industry was formed from the Reich Federation (Reichsverband) of German Industry which existed up to 1933, which in turn was the legal successor of industrialists associations which had already been founded during the second half of the preceding century. In accordance with the principles of the Reich Federation industry Dr. v n Schnitzler also considered it to be the duty of the organization and also his personal duty to create a representative agency for industrialists, which, free of all party politics, dealt only with economic questions and which, beyond that,

- 2 -

also withdrew economy and in particular industry from party-political influences as far as possible. Looking back it can be said today that this problem of the Reich group industry was solved to a great extent, if one considers the conditions in state under a totalitarian government. In this respect it is unimportant that the Reich group industry had to adopt, for their formal structure, some principles which agreed with the new ideology, for instance enforced membership. The Fuehrer principle was, in practice, put into effect in the Reich group industry, the industrialists much rather formed their opinions in a democratic manner, by way of a general discussion and by thorough investigation of the wishes of the industrialists by other means. In its personnel policy also the Reich group industry did not give way to party-political influence, which is shown by the mere fact, that a large proportion of its honorable did not belong to the NSDAP.

Dr. von Schnitzler belonged to several groups of the Reich group industry. Thereby his activity as chairman of a committee which dealt with exhibition and fair problems and of another committee for industrial economic publicity should be particularly emphasized. Further he was a member of the so-called foreign trade committees and in his position as chairman of committees he was automatically a member of the so-called Extended Advisory Board (Grosser Beirat) of the Reich Group Industry, an institution which was a collecting point for all personalities who worked honorarily in leading positions.
Dr. von Schnitzler did

- 30 -

- 3 -

not belong to the select advisory board of the Reich Group Industry which had greater influence.

When reforming the industrial organization, it appeared practicable to keep up or to found in opposition/the so-called publicity council for German industry founded by the Propaganda Ministry, institutions which would allow the forming of an opinion, in questions of advertising and in problems dealing with exhibitions and fairs free from party influences. Therefore the exhibition and fair committee of German industry was formed (as continuation of the former German exhibition and fair office), which was under management of Reich Group Industry and a committee for industrial publicity to which belonged only leading practitioners of industry in this field. At the time Dr. von Schnitzler was elected as chairman in consideration of his exceptional experience in both fields and also because he seemed to be particularly qualified because in 1929 he had been German Reich commissioner for the Barcelona world exhibition. Dr. von Schnitzler, in the work required of him, fulfilled all expectations and consciously avoided any party political propaganda in his work. His objective attitude found its recognition also in the fact that he became chairman of the exhibition and fair committee of the international board of trade in Paris.

Dr. von Schnitzler was particularly interested in all attempts which aimed at an understanding with foreign countries. This also in keeping with his outwardly recognizable man-of-the-world and citizen-of-the-world- attitude. As far as I know for that reason he also took part, in spring 1939, in the discussions which

- 31 -

- 4 -

were conducted by the Reich Group Industry with the federation of British industries, the aim of which was the furtherance of Anglo-German cooperation. After the Anglo-German coal agreement had been signed in London in February 1939 the first meeting of Anglo-German industrialists on German soil in March 1939 made a pleasing opening for further conferences that had been planned. To the greatest disappointment of the German industrial representatives this discussion was broken off by the English when German troops occupied Prague in March 1939.

There is no doubt that Dr. von Schnitzler also had the justifiable hope that international tension would be relaxed by the Anglo-German industrial discussions and a contribution would be made to a peaceful development. He, in particular, had often expressed the desire to be on good terms with the English economically.

From discussions which Dr. von Schnitzler had with me or my co-worker especially during the war, I know his sorrow about the outbreak of this war and also his very real worries about the severance of economic relations connected therewith.

I have carefully read the above affidavit and signed it personally.

Luesselforf, 15 April 1948.

signed: Wilhelm Zangen
(Wilhelm Zangen)

- 5 -

⁶²⁰
Number/of document register for 1948.

On the basis of its being appended in my presence

I hereby certify the signature of General Director Wilhelm

Z a n g e n , known to me personally, resident in Duesseldorf,

Coalition No. 6-8.

Duesseldorf, 14 April 1948

signed: R e e m e r

Notary

Stamp: Notary Karl Reemer
Duesseldorf

- 33 -

APPIDAVIT

I, Dr. Felix Ehrmann, born 13 September 1901, Evangelical, a chemist, residing in Baddeckenstedt, Kreis Wolfenbuettel, have been warned that I shall render myself liable to punishment if I make a false statement under oath, I declare on oath that my statements are true and that they were made to be submitted as evidence to the Military Tribunal No. VI in the Palace of Justice, Muenberg, Germany.

Since 1 May 1926 I have worked with the Society for Safeguarding the Interests of Germany's Chemical Industry, both before and after its reorganization as the Economic Group Chemical Industry until the termination of its activities at the end of the war. In addition I worked concurrently with the Reich Office for Chemistry from September 1934 likewise until the termination of its activities at the end of the war. At the present time I am chief manager of the Economic Association for the Chemical Industry, British Control Area.

Having been asked about the responsibilities and activities of Dr. von Schnitzler submit the following statements:

1. I remember that Dr. von Schnitzler was Deputy Chief of the Economic Group Chemistry from about 1934 or 1935 until 1941 or 1942. As far as I can say, he never made himself prominent in this capacity,

-2- -

and, in particular, he never had occasion to deputize for the Chief of the Economic Group in the latter's official functions; instead, the particular chiefs at the time, Director Clemm and Director Hess, always carried out the directing functions themselves. This had the effect in practice that Dr. von Schnitzler carried the title but did not perform the duties of the office.

2. The Inner Advisory Council of the Economic Group, to which Herr von Schnitzler belonged, as far as I recall, from about 1934 until 1941 or 1942, had only advisory functions, according to my observations, and occupied itself preferably with questions of internal organization and with the financial policies of the Group (problems of personnel, budget). Its participation in the handling of current problems, such as in the field of prices and cartels and in commercial policy, had rather the character of a body of expert advisers. As far as I remember, it was resorted to on the whole only for formal reasons.

3. In the course of the reorganization of the Group, about 1942 or 1943, the Inner Advisory Council was dissolved, or - I no longer recall the procedure - it lost also the slight functions it originally had. A Praesidium was formed; Herr von Schnitzler did not belong to it, however, and, to my recollection, he also resigned from the position of Deputy Chief of the Group.

I have carefully read this affidavit, consisting of one page, I have personally signed it, and made the necessary corrections

- 3 -

and signed them with my initials.

I declare on oath that the facts stated by me in
this affidavit are the whole truth to the best of my
knowledge and belief.

Hannover, 24 March 1948

signed: Dr. Felix Ehrmann

No. 224 of the Document Register, 1948.

I hereby certify the above signature, appended in
my presence, of Dr. Felix Ehrmann in Saddekenstedt No.
66.

Hannover, 24 March 1948.

Stamp:

Dr. jur. Walter Geiss
Notary in Hannover

(signed): Dr. Walter Geiss
Notary

Costs:

Value: 1,000.-- RM
Fee, Sec. 26, 39, 144
of the RKO
Turnover tax, 3%

RM 4.--
RM 0.12
RM 4.12

The Notary

Dr. Geiss.

- 36 -

APPIDAVIT

I, Fritz Fischer - Jene, born on 26 February 1891 in Mannheim, Department Chief of the Advertising Department of the I.G. Farbenindustrie from 1921 until 1944, pensioned off since 1944 as permanently incapacitated for work, residing in Pfaffenwiesbach in Taunus, have been warned that I shall render myself liable to punishment if I make a false affidavit. I declare on oath that my statements are true and that they were made in order to be submitted to the Military Tribunal No. VI in the Palace of Justice in Nuremberg, Germany.

Dr. Rupprecht von Keller, defense counsel with the American Tribunal in Nuremberg, requires, in connection with the I.G. defense in which he is acting on behalf of Dr. von Schnitzler detailed information concerning the nature of Dr. von Schnitzler's activities in the following four capacities:

- 1) as chairman of the permanent Committee for Exhibitions of the Reich Group Industry
- 2) as chairman of the Committee for Industrial Business Advertising of the Reich Group Industry
- 3) as executive functionary for the directives of the Advertising Council in the field of "German Business Advertising Abroad"
- 4) as member of the Aufsichtsrat of the A. I. A. Anzeigen-A.G., Berlin.

As already mentioned above, I was Chief of the Advertising Department of the I.G. for the dye business from 1921

- 2 -

until I contracted a serious lung and heart complaint in 1944, which incapacitated me for work, so that I can only make statements concerning the time until this period (second half of 1944).

I have known Dr. von Schnitzler for years, for as head of the dye business he was my supervisor and he it was too who made me his colleague at the time in the four above-mentioned fields of activity. I was thereby given the opportunity to become acquainted with Herr von Schnitzler's attitude toward the commercial advertising activities of the I.G. on the one hand and on the other hand, towards the often remarkable policies of the German advertising council, which Herr Schnitzler inwardly repudiated.

Ex. 1) So far as I recall Dr. von Schnitzler was made chairman of the Committee for Exhibitions and Fairs of the Reich Group Industry, in 1934, because he had already had the reputation of being an authority in the field of exhibitions long before this time and long before Hitler. It was for precisely the reasons as can be easily verified from all kinds of records, that Herr von Schnitzler was appointed Commissioner General in 1929 of the World Exhibition at Barcelona, and in this capacity he not only had the management for I.G., but for all the German industries represented in the Exhibition. Furthermore he functioned as an expert consultant (a "Sachverstaendiger") also long before 1933, for an international regulation of the award system at world exhibitions. If he was willing at that time to take over these various offices connected with business advertising, he did so, I am firmly convinced, not for any political reasons, but for purely business

- 3 -

reasons, on the ^{one} hand for the I.G. and on the other for German business as a whole. What von Schnitzler declared in 1929 on the occasion of the opening of the German sections in Barcelona, before an international forum and in the presence of the King of Spain, was also later always his inner policy for everything he did for German exhibition activities until the collapse. He said, among other things:

"To have here tried to show what we can do, what we are, and how we look at things. We desire nothing else but clarity, simplicity, honesty."

In all the years of his activity as chairman of this Committee for Exhibitions he repudiated, to the best of his powers, all attempts to use the German fairs and exhibitions for political purposes, and so far as possible he thwarted such attempts time and again. It is probably sufficiently known that difficulties were made for him on this account, especially by the Advertising Council. But it must be equally well known to all foreign countries that precisely the exhibitions of the I.G. were set up on a strictly business and commercial basis. The pressure of the advertising council, which could be felt as early as the years 1935/36, and which was later greatly intensified in the war years, extended to the Reich Group Industry and through the latter the individual German industrial firms. As a neutral chairman for industry as a whole Dr. von Schnitzler managed to thwart, time and again, the demands of the Advertising Council, which were often so unbusinesslike and even actually harmful to business, and ultimately to give to the representative exhibitions the business aspect after which he constantly strove.

- 39 -

- 4 -

Ad 2.) The Committee for Industrial Commercial Advertising: This had the task of giving German commercial advertising - and only this - a dignified, impressive and forceful character, to discuss advertising methods for industrial products of all kinds, and to give advice to this or that firm. Here the Advertising Council was right in its criticism, when immediately upon assuming its activities it found fault with backwardness in some respects of the advertising of many German firms and when it pointed out the incomparably more skilful methods of foreign advertising. In this Committee, which was only concerned with commercial problems, Herr von Schnitzler also managed, likewise by employing diplomacy and without offending the Advertising Council, to make the solely-commercial attitude of German industry prevail, which, as is probably also widely known, always gave extensive consideration to the susceptibilities of its foreign customers. Dr. von Schnitzler consistently opposed any use of advertising for political purposes.

Ad 3.) The Advertising Council of the German economy was not meant to be an Office (Amt) or a governmental authority, as it said time and again, but merely an auxiliary organ of the "controlled economy", with the aid of which commercial advertising was to appear representative, and dignified; among other things, it had set itself the task of doing away with what was then described as the "numerous evidences of lack of taste and exaggerations in public advertisements and posters, called unfair advertising." In 1939/40, after the beginning of the war, the Advertising Council abandoned this field of giving technical advice in advertising methods, and attempted to gain an influence, with a persistence that increased during the course

- 5 -

of the war, on the wording of the advertisements. . .
It began with "directives", which were to be forwarded
to industry by the Reich Group Industry, and finally it
even began to issue regulations, according to which,
as was said at that time, purely commercial advertising
was no longer permitted at home and abroad. The ad-
vertisements had to take into account the "exigencies
of the times" in one way or another. Such slogans appeared
as "Down with waste", "Preserve things of material
value", "Save coal and electricity", "Keep down the
consumption of consumer goods", and advertisements de-
la "Don't ~~spill~~ coal", "Groschen saving" etc. Complaints
were made to industry that foreign advertising
was incomparably better and more effective, and that
German industry was expected to come up to the
level of foreign firms in this field as far as
possible. Finally, in 1943 the Advertising Council
even demanded that a certain political slant be given
to the advertisements, in the style of the English
wartime advertisement. "Formerly we built automobiles,
now we build airplanes". Here Dr. von Schnitzler
very definitely refused and declared in unmistakable
terms that industry could not comply with such demands,
for one reason because German industry, as before,
had to consider its foreign customers, and for another
because it was convinced that advertisements of that
type would not even be accepted by foreign papers.
Dr. von Schnitzler then found the solution, together
with the Vorstandsleute of other I.G. Farben (branches) -
to avoid being ordered by the Advertising Council
to cease all our foreign advertising - of preparing
advertisements

- 6 -

the importance of German industry and German scientists, chemists and physicians, and which would call attention to products known throughout the whole world to be manufactured by Germany. In the narrow circle of business men von Schnitzler had only an ironic smile for such demands of the Advertising Council that were remote from the world and business practice. For the dye business the Propaganda Abteilung ("Advertising Department") in my charge was given order to work out advertisements with references to color-fast or moth-proof qualities. Moreover, this Propaganda Abteilung was set up - a fact which should also be mentioned here - as early as 1922, with the designation, Farbenpropaganda, (Lye Propaganda) and in 1930 it was abbreviated to Propaganda Abteilung ("Advertising Department"), because the advertising of Indanthren dyes "Eulan" an anti-moth substance, and of "Ramasit" an impregnating agent three products for which an advertising campaign of world-wide scope was conducted was added to our former main activity. That this, too, was confined to purely commercial advertising may probably best be proved by a letter from Dr. Goebbels to Herr von Schnitzler in which Dr. Goebbels very severely criticizes the fact that this Department of the I.G. in Frankfurt called itself Propaganda-Abteilung. He said that propaganda was his field of activity, and that he would have to request that this word be eliminated at once, that the Department would have to be renamed either "Reklamo-Abteilung" or "Werbe-Abteilung" (Advertising Department).

Thereupon Herr von Schnitzler named this Department "Werbe-Abteilung". In announcing the policies for foreign advertising Dr. von Schnitzler brought to the attention of German industry.

- 42 -

-7-

in a very incisive manner that the "introduction of political advertising into commodity advertising" had far-known reasons always been unacceptable to the large exporting industrial firms, and that it was still unacceptable at the present, so that it would be necessary to continue to employ the restraint used in the past for advertisements by firms.

Ad 4) Ala Anzeigen-Exposition. In 1927 the Agfa-Berlin acquired the Iha (Industrie- und Handels-Anzeigen-Exposition of Max Grahl, Berlin), in order to administer through one agency all advertisements of the Photo Department, the Vistula-Department, the Repro-Department, the Wolfen Works, and SO 36, and thereby obtain greater influence in the placing/obvious that the flood of advertisements that were so collected and that came from one agency were considered to be of greater interest from a business standpoint by the newspapers and magazines than the former separate advertisements that arrived independently of one another. But the other I.G. Sparten also soon realized that a coordination of this kind was useful for all, and it was decided to have all the advertisements go through this Iha. Formerly a large proportion of the advertisements went through the Ala, whereas now only part orders went to the Ala by way of the Iha. With the beginning of the so-called Third Reich and the birth of the Publicity Council, however, it was soon recognized there that the possession of a large advertising agency constituted a very attractive institution not only for advertising but also economically. The Ala was absorbed, even though outwardly it continued as an independent Aktiengesellschaft; soon, however, the Ala likewise absorbed the Iha, regardless of whether the I.G. wished it or not. The fact that Herr von Schnitzler was later

- 8 -

taken into the Aufsichtsrat of the Ala was not because of political reasons, for, as may be easily verified, the Ala functioned purely on a business basis and in no way politically; this was done simply in order to have a leading man of one of the largest advertising clients represented on this Aufsichtsrat.

Pfaffenwiesbach in Taunus,
28 March 1948.

(signed:) Fritz Fischer-Jeno.

I, Bürgermeister E i t e l hereby certify and attest the above signature, appended in my presence, of Herr Fritz Fischer-Jeno, residing in Pfaffenwiesbach in Taunus.

Pfaffenwiesbach in Taunus.

The Bürgermeister,
as the local policy authority.

(signed:) Eitel

Temp: Periah
Pfaffenwiesbach.

- 44 -

AFFIDAVIT

I, Erich Mueller, residing at Hamburg-Gross-Flottbek, Teenningerstr. 7, hereby declare on oath that the following statements are the truth to the best of my knowledge and belief and were made to be submitted as evidence to the American Military Tribunal No. VI in Nuernberg.

Until 1945 I was an employee of I.G. Farbenindustrie A.G. and as such worked in the political-economic department of the administrative offices of the I.G. in Berlin known as "Berlin N.E. 7."

I have been shown Document NI-631 which is an invitation of the member of the Vorstand of I.G. Hermann Weibel, now deceased, to a dinner given on 4 November 1942 in Berlin with some representatives of the Foreign Organization of the NSDAP.

I wish to comment that to my knowledge this dinner was given at the request of Herr Weibel in order to improve I.G.'s relations with authoritative persons in the Foreign Organization. Until then these relations had not been very good since I.G. took little notice of the wishes of the Foreign Organization abroad with the result that complaints of the foreign representatives were continuously received in the Berlin headquarters (Leitung) of the Foreign Organization. On the other hand the management of I.G. had had little contact with the management of the Foreign Organization, and this led to the displeasure of the latter. Therefore Herr Weibel had already been directed previously to eliminate existing difficulties.

I remember exactly that this dinner was intended to create a friendly attitude towards the Foreign Organization and outwardly achieved its purpose. The existing gap in questions of basic policy stemming from the fact that the guiding principles of the I.G. were based on economic considerations,

- 2 -

and those of the Foreign Organization were based on
political considerations, was not bridged.

signed: Erich Mueller.

Document Register No. 15/48 Ho.

Sworn to and signed before me, Hans Holtappels,
notary at Hamburg, Boersenbruecke 2 a, by Herr Erich
Mueller, Hamburg, -Gross Plottbek, Teenningerstr. 7,
known to me to be the person making the above
affidavit.

Hamburg, 7 January 1948

The Notary.
signed: Holtappels.

Costs:

Value: RM 3,000.00 not final

Fees Sec. 39 I RM 4.00

Turnover tax " 0.12

Total RM 4.12

The Notary.
H. (Holtappels)

AFFIDAVIT

I, Dr. Guenther Brank-Pahle, Oberursel in Taunus, Luisenhof, have been warned, that I render myself liable to punishment by making a false affidavit. I declare on oath that my statements are the truth and were made to be submitted as evidence to Military Tribunal No. VI in the Palace of Justice, Muenberg, Germany.

From 1933 until 1945 I worked with the I.G. Farben-Industrie Aktiengesellschaft, from 1935 as a Direktor and in the management of the Central Financial Administration, i.e. I.G. Berlin NW 7. Since the re-organization of the business committee in 1935 I was secretary of this committee.

The defense has requested me to comment on the following contention of the prosecution:

"In the spring of 1940 I.G. - through the defendant von Schnitzler, ^{who} had been entrusted with this task by the business committee, established an organization called "sales promotion company" (Verkaufsforderungsgesellschaft) for the solution of this problem, which organization was under his supervisory control and was supposed to serve as a blind for the espionage agents sent abroad by counter-intelligence."

I took part in the meeting, but did not myself formulate point 2 - the mobilization question. (M-Frage). I do not recall any discussion of the "sales promotion company". Nor do I recall that there was any mention of this company at any other meeting of the business committee. Moreover, I do not recall that

- 2 -

Dr. von Schnitzler or any other defendant, or any employee of I.G. or any third person discussed this company outside the meetings. I only received knowledge of the existence of this company in 1945 when Dr. von Schnitzler was already in American custody. I herewith expressly state that, if the sales promotion company had been an organization which in any way whatsoever was in contact with the business committee, I would have been acquainted with that fact. But this is not the case.

Relative to the uniform co-ordination of future centralized control as mentioned in the minutes (Protokoll) of 17 April 1940 the case is as follows:

As the local military offices in Germany the counter-intelligence organization of the High Command of the Wehrmacht had officers which endeavored in their regional zones to obtain important information from abroad through German industry. They also endeavored in their local regions to harness for their own purposes German enterprises which had connections or organizations abroad. For understandable reasons, of which I would name primarily the desire to maintain its foreign organizations intact the I.G. had a basically negative attitude towards all solicitations of that sort. The best method for refusing applications of this sort made by the local offices was to refer to an agreement of I.G. with the Central Counter-Intelligence Office of the High Command of the Wehrmacht.

The wording of the minutes of 17 April 1940 clearly shows the nature of this matter. It was impossible to portray the work of counter-intelligence as useless or detrimental during the war;

- 3 -

consequently it is stated in the minutes that the importance of the counter-intelligence question for I.G. is beyond doubt, but that treatment through the local offices of that matter, which in itself is good, is inexpedient. The ultimate goal of the conference in the business committee and the directive given to Dr. von Schnitzler by the business committee, was as follows:

Dr. von Schnitzler was to urge the gentlemen at the High Command of the Wehrmacht to instruct their local offices to leave I.G. uncollected by requests, and to remind them again that the collaboration of I.G. in counter-intelligence questions can only be effected through the counter-intelligence office of the High Command of the Wehrmacht. The relationship of I.G. to the Central Office of Counter Intelligence at the High Command of the Wehrmacht was such that these men had understanding for the fact that the I.G. could and would not expose itself in counter-intelligence questions.

This treatment of the affair is clearly evident from the substance of the business committee's minutes of 27 May 1940, wherein Dr. von Schnitzler reported on his discussions in Bad Kissingen. At this meeting I was not present, but assume that Dr. von Schnitzler met a gentleman from the Counter-Intelligence of the High Command of the Wehrmacht at Bad Kissingen. Thereupon it was agreed that requests of the Counter-Intelligence should always be presented only to the managers of the sales companies personally. The wording, obviously selected with care:

"At the discussion in Bad Kissingen our special organization abroad was again discussed and reference was made to the small number of Reich Germans in it. These willingly give advice when the occasion arises. In general, however, there is no possibility for the hire of further Reich Germans".

also clearly shows that Dr. von Schnitzler presented the undivided opinion of the gentlemen of the business committee to exercise extreme reserve where co-operation

with counter-intelligence is involved. It goes without saying that during these negotiations the gentlemen of I.G. could not show a 100% negative attitude towards the Counter-Intelligence, but rather had to manoeuvre diplomatically.

Luisenhof bei Oberursel i/Ts., 21 April 1948.

Signed: Guenther Frank-Pahle.

Sworn to and signed before me by Dr. Guenther Frank-Pahle, residing at Oberursel i/Taunus, know to me to be the person making the above affidavit.

Muenberg, 29 April 1948

(signed): Dr. Walter Bachon

(Dr. Walter Bachon)

APPENDIX VII

I, Erwin Kritzer, residing at Leverkusen-Wiesdorf, A.W. Hofmann-Strasse 9, hereby declare on oath that the following statements are the truth to the best of my knowledge and belief and were made to be submitted as evidence to the American Military Tribunal in Case VI (I.G. Farbenindustrie Aktiengesellschaft).

I entered the service of Farbenfabriken (dye factories), formerly Fried. Bayer & Co., Leverkusen, on 1 November 1911. Since 1 May 1920 until the death of Geheimrat Duisburg on 19 March 1935 I was in charge of his Economic Secretariat.

Herr Jesco von Puttkamer, then editor of the periodical "Reclams Universal", Leipzig, was commissioned by Geheimrat Duisburg to write the book "Memoirs of my life" (Meine Lebenserinnerungen) for him. During the preparatory work for the book, Herr von Puttkamer (1933/34) was in Leverkusen for some time to look through the file material required by him. Herr von Puttkamer was paid for his services by Geheimrat Duisburg. He was not an employee of I.G. during this period. Nor did I learn that Herr von Puttkamer was an employee of any I.G. plant at any other time. In view of the former co-operation the secretariat would surely have been informed by Geheimrat Duisburg
Leverkusen-Bayerwerk, 29 April 1948

(Signed): Erwin Kritzer

- 2 -

Sworn to and signed before me, Dr. Hugo Schramm,
attorney at law by Erwin Kritzer, residing at Lever-
kusen-Wiesdorf, A.V. Hofmann-Strasse 9, known to me to
be the person making the above affidavit.

Leverkusen, Bayerwerk, 29 April 1948

(Signed): Dr. Hugo Schramm
Attorney at Law and Defense
Counsel

Kurt Nadolski

Farbenfabriken Bayer
(Dye Factories)

Leverkusen-Bayerwerk, 29 April 1948

Personnel Department

AFFIDAVIT

I, Kurt Nadolski, born on 5 June 1908, residing at Opladen, Uhlandstrasse 7, director of the personnel department of the Farbenfabriken Bayer, Leverkusen-Bayerwerk, have been warned, that I render myself liable to punishment by making a false affidavit. I declare on oath that my statements are the truth and were made to be submitted as evidence to Military Tribunal No. VI in the Palace of Justice, Nuremberg, Germany.

I herewith state that Herr Jesco von Puttkamer was neither an employee nor a worker in the services of I.G. Farbenindustrie Aktiengesellschaft in liquidation nor of the present Farbenfabriken Bayer, Niederrhein united plants.

(Signed): Kurt Nadolski

S sworn to and signed before me, Attorney Dr. Hugo Schramm, on 29 April 1948 by Herr Kurt Nadolski, Opladen, Uhlandstrasse 7, known to me to be the person making the above affidavit.

Leverkusen, 29 April 1948

(Signed): Dr. Hugo Schramm

Dr. Hugo Schramm
Attorney at Law and Defense Counsel.

APPENDIX

I, Herbert Boldt, born on 15 March 1909, residing at Offenbach am Main, Friedrichstr. 2, hereby declare on oath that the following statements are the truth to the best of my knowledge and belief and were made to be submitted as evidence to the American Military Tribunal in Case VI in the Palace of Justice, Nuremberg, Germany.

From 1938 to 1944 I worked as Oberregierungsrat in the Reich Economics Ministry. Since 1944 I was active as Ministerialrat in the Maritime Office, since November 1946 as Ministerialrat in the Administrative Office for Traffic and Transportation.

Through my position as official I knew how during the war appointments came about of numerous industrialists as Military Economic Leaders. Such appointments were merely a distinction, which was awarded by the Reich Economic Minister in consideration of purely economic services of the industrialists concerned. In making the appointments party connections played no part; decisive was the position in economy. In this connection it is of significance that the Reich Economic Minister had no other possibility to decorate an industrialist, particularly since he was not entitled to award orders or decorations or other titles.

- 2 -

Since an appointment of Military Economic Leader was a distinction no special activities were associated with this position. The position as Military Economic Leader had no practical consequences, with the one exception that a Military Economic Leader remained free on principle from military service owing to his activities as an industrialist.

The appointment of Dr. von Schnitzler as a Military Economic Leader was made for reasons corresponding to the above.

(Signed): Herbert Boldt.

Overleaf signature in his own hand
of Herr Ministerialrat Boldt
is herewith certified:

Offenbach (Main), 2 April 1948

Stamp: Administration for Traffic and Transportation
of the United Industrial Region

Offenbach am Main

(Signed): Lenke

Employee

AFFIDAVIT

I, Olla Rosengart-Schnitzler, born on 24 April 1890, residing at Kloster Maria Ralf, Mehlen am Rhein, Mainzerstrasse, have been warned, that I render myself liable to punishment ~~for~~ making a false affidavit. I declare on oath that my ~~statements~~ are true and were made to be submitted as evidence to Military Tribunal, ~~Neuenberg~~, Palace of Justice.

Herr Georg von Schnitzler is my second cousin. The Jewish Physician Dr. Paul Rosengart, Frankfurt on Main, Reuterweg 51, to whom I was then married, received the position of physician of I.G. Farben through Herr von Schnitzler's mediation in 1927.

In this position Herr von Schnitzler kept him until this became impossible through the general development of the situation during 1934.

Even before my husband had, through the national socialist laws and regulations, lost the permission to treat patients who were members of sick funds. Thus the practice taken over from his father was destroyed. This circumstance and primarily the terrible spiritual pressure contributed to the fact that my husband and I left Frankfurt in 1934 and emigrated to Switzerland.

- 2 -

Until the moment of our final departure from Frankfurt, Herr von Schnitzler maintained personal relations with my husband. My husband was also house physician for his entire, very large household until our departure.

Herr von Schnitzler also invited us to his house at a time when this could be very detrimental to him and visited us on his part in the house of Jewish Geheimrat Arthur von Weinberg where we found refuge in the latter period.

I recall positively the deprecating remarks made by Herr von Schnitzler concerning the Party. It was unmistakable to us that he was inwardly opposed to it. His kindheartedness and his willingness to help us gave us much comfort in this difficult period.

I emphasize that my marriage with my husband was not dissolved for racial, religious or political reasons.

Mehlen on Rhein, 30 March 1948

signed: Olga Rosengart-Schnitzler
Olga Rosengart-Schnitzler

Document Register No. 591/1948

Sworn to and signed before me by Frau Olga Rosengart-Schnitzler, divorced wife Rosengart, without profession, at Mehlen/Rhein, Mainzerstrasse 256, known to me to be the person making the above affidavit.

Koeln, 1 April 1948

Officially appointed representative
of the notary Dr. Berndorff
signed: Signature
Notary, Assessor

Stamp

AFFIDAVIT

I, Dr. Reinhard Goldberg, residing in Ludwigshafen/Rhein, Weehlerstr. 13, have been warned, that I render myself liable to punishment by making a false affidavit. I declare on oath that my statements are true and were made to be submitted as evidence to the Military Tribunal at the Palace of Justice in Nuernberg, Germany.

I entered the services of the Badische Anilin und Sodafabrik, Ludwigshafen Rhein, on 15 February 1919 as a chemist, was first employed in the Oppau Ammonia laboratory, and since 1933 was director of the offices of Sparte I (nitrogen).

I knew Herr Dr. Mueller-Gunradi for many years through my activities in Oppau. Business relations were particularly close since 1929, where common work in the field of gasoline offered many points of contact which became even more intensified especially after 1929, when Dr. Mueller-Gunradi took over the management of the Oppau plant. As director of the offices of Sparte I I had to handle financial questions especially. A very important point here was the establishment of the amounts of money needed for new investments, which required continuous consultations with the directors of the plants.

- 2 -

In this capacity as director of the Sparte offices I can attest that Dr. Mueller-Gunradi had no official responsibility in connection with the planning, the construction or the plant management of the Auschwitz plant. He was rather in charge of the erection of the Heydebreck plant. Thus he could hardly have obtained knowledge of the Auschwitz plant by having responsibility for the installation or operation of the Auschwitz plant.

In my capacity as director of the Sparte offices I had consultations almost daily for years with Dr. Mueller-Gunradi. Since our relationship became very close through intensified co-operation, personal matters or matters of general interest were naturally also mentioned during the conversations. For example, I thus know that Dr. Mueller-Gunradi was very negatively disposed towards national socialism. Since he was responsible for the construction of the Heydebreck plant, there was naturally a certain competition with the Auschwitz plant. Thus in Auschwitz and in Heydebreck nitrogen was produced, as planned. The ammonia from the Auschwitz production, however, was to be processed in Heydebreck. Isobutyl alcohol was also to be produced in both plants. Thus it was understandable that, during the conversation which we had, Auschwitz should also be discussed, but never did Dr. Mueller-Gunradi make any mention whatsoever in my presence of gassings in Auschwitz or the use in Auschwitz of gases produced at I.G. for the purpose of gassing. In view of the communicative character of Dr. Mueller-Gunradi and our personal relationship,

- 3 -

some mention of these matters by Dr. Mueller-Gunradi to me would have suggested itself, the more so since he was very critical of national socialism and he also knew that my attitude towards national socialism always was a negative one.

signed: Dr. Reinhard Goldberg
(Goldberg)

Ludwigshafen/Rhein, 22 March 1948

I herewith certify the above signature executed before me this day.

signed: Dr. Kurt Hartmann

(Assistant Defense Counsel
in Case VI).

- 60 -

Wilhelm Bornann
(16) Frankfurt on Main
Gutleutstrasse 41 I.

AFFIDAVIT

I, Wilhelm Bornann, born on 20 January 1894 in Weeltingerode, Business employee, residing at Frankfurt on Main, Gutleutstrasse 41 I, have been warned that I render myself liable to punishment by making a false affidavit. I declare on oath that my statements are true and were made to be submitted as evidence to the Military Tribunal No. VI in the Palace of Justice, Muernberg, Germany.

Frankfurt o/Main, 22 March 1948

signed: Wilhelm Bornann.

On 1 July 1920 I entered the services of the predecessor of the I.G. Farbenindustrie Aktiengesellschaft, Frankfurt o/Main, the former Chemische Fabrik Grisehain-Elektron, Frankfurt o/Main, Gutleutstr. 31, as a business employee. In October 1930 I moved with it into the administration building, Frankfurt o/Main, Grueneburgplatz. At the outbreak of war I took over the management of affairs of the personnel department, Grueneburgplatz, deputizing for the department manager, Dr. Albert Kissling, called into Wehrmacht service. There I was directly subordinate to the plant manager, Dr. von Schnitzler.

During this activity lasting more than 5 years I could establish that Dr. von Schnitzler's personnel policy was guided solely by purely objective considerations, and that his attitude towards national socialistic endeavors was a negative one.

- 2 -

Thus, for example, contrary to the Party demands, members of the firm were not classified as indispensable (uk), because they held positions as Ortsgruppenleiter or deputy Ortsgruppenleiter. Dr. von Schnitzler's decisions on these questions were based solely and exclusively on whether they were indispensable to plant operations. Just as little was the Party directive heeded which would allow the political plant administration to collaborate in classifying as indispensable members of the plant. Foreign personnel assigned to the firm through the local labor office were given excellent care at all times. Their rations were in general better than those of the German personnel. The people were always treated properly, they had good quarters and some of them, in spite of the Party's prohibition, were even housed in private quarters. In case of air attacks, they had access to the same air-raid shelters as the plant members of German nationality, although this was not allowed under the instructions of the Party authorities. These are only some of the instances which I recall.

During our collaboration in the scope of the personnel interests of the I.G.-Hochhaus (building Frankfurt) I got to know Dr. von Schnitzler not only as a very conscientious and just superior of noble mind, but primarily also as a plant manager of deep human spirit with great understanding of the need and difficulties of members of the plant in their ^{vicissitudes} regardless of personal considerations. The fact that workers and employees who often fell into economic need because of sickness and the like were not only reimbursed for accumulated costs, but were moreover given supplementary financial and other assistance to meet the resultant difficulties, is adequate testimony for the social minded

- 3 -

attitude of Dr. von Schnitzler.

I believe it to be my duty to present the observations made above to the high court, since in my opinion they are of some significance in the judgment of Dr. von Schnitzler's character.

Frankfurt on Main, 22 March 1948

signed: Wilhelm Bornann.

I herewith certify that the above is ~~the~~ signature of Herr Wilhelm Bornann.

Muenberg, 16 April 1948

signed: Heinrich von Rospatt
(Heinrich von Rospatt)

- 63 -

AFFIDAVIT

I, Richard von Szilvinnyi, Frankfurt/Main-Niederrad, Waldfriedeck II, i.e. Jagdhaus Oberdrauberg i/~~Geiseltal~~, have been warned, that I render myself liable to punishment by making a false affidavit. I declare on oath that my statement is true and was made to be submitted as evidence to the Military Tribunal at the Palace of Justice, Ruernberg, Germany.

From 1 April 1930 to May 1945 I was a member of the I.G. Farbenindustrie. After the confiscation of the I.G. by the American authorities, I assumed the management of the Cassella Farbwerke Mainkur, formerly belonging to I.G., as Acting Manager.

To the question, ^{as} to whether everything possible had been done by I.G. to get Geheimrat Dr. Arthur von Weinberg out of Theresienstadt, I declare the following:

As son-in-law of Herr Carl von Weinberg I was not directly concerned with the handling of this question, but my knowledge is rather based on the information given to me at the time by Princess Charlotte Lobkowitz, the one daughter of Geheimrat Dr. Arthur von Weinberg and Count Rudolf Spreti, his son-in-law, as well as by several gentlemen of I.G., ^{such} as Dr. von Schnitzler, Dr. Frank-Pohle and Dr. Krueger. I may say that the indignation about the arrest of Geheimrat von Weinberg was extremely great, not only in the entire Hoechhaus (administration building) of I.G. Farbenindustrie, but everywhere and was also

- 2 -

expressed quite openly.

I heard at the time that the family intended to take steps immediately with the Gestapo, but that on the advice of the I.G. men in Berlin these were not undertaken at first because it was thought that better results would be achieved if the I.G., as a firm of consequence, should instigate appropriate measures. I know through Princess Lobkowitz, and also from Dr. von Schnitzler, who immediately informed me, that Geheimrat Schmitz and Dr. Krauch personally made representations to the offices concerned and that in the name of the Vorstand of the I.G. an application - I believe to Himmler - was made for the immediate release of Geheimrat von Weinberg. In my opinion, I.G. neglected nothing, but it lay in the nature of things that these negotiations were continuously drawn out and delayed by the other side. A chance interview of Princess Lobkowitz with SS-Gruppenführer Lorenz (not Wolff as I assumed originally), apparently together with efforts of I.G., resulted in Himmler's arranging to release Geheimrat Dr. Arthur von Weinberg from Theresienstadt under the following conditions:

- a) that Geheimrat Dr. Arthur von Weinberg should live in Serrahn, the residence of Princess Lobkowitz, for the rest of his life, and
- b) that this was approved by the local Gauleiter of Mecklenburg.

However, this approval was never given; and, shortly after this came a notification of the death of Geheimrat Dr. Arthur von Weinberg. After 1945^{it} became known

- 3 -

that a gall operation had been ~~carried out~~ him -

he had been completely weakened by hunger, as a result of which he died.

Frankfurt/M.

22 September 1947

signed: Richard v. Szilvinyi

Sworn to and signed before me, Attorney H. Henze,
by Herr Richard von Szilvinyi, Frankfurt a.M.-Niederrad,
Waldfriedeck II, also Jagdhaus Oberdrauberg in Corinthia,
known to me to be the person making the above affidavit.
Frankfurt/M. 22 September 1947

signed: Helmut Henze
Attorney-at-Law

DOCUMENT BOOK XI SCHWITZLER No. 215
Exhibit No.

Affidavit

I, Richard von Seilwinyi, Frankfurt/Main-Niederrad, Wald-
friedeck II and Hunting Lodge Oberdrauburg i/Maernten, have been
warned that any false statement on my part will render me liable to
prosecution. I declare on oath that my statement corresponds to the
truth and was made to be submitted in evidence to the Military Tribunal
No. VI at the Palace of Justice in Nuernberg, Germany.

I was a member of the staff of the I.G. Farbenindustrie from 1 April
1930 until May 1945. After the confiscation of the I.G. by the
American authorities I took over the management as acting manager
of the Cassella Farbwerke Mainkur which formerly belonged to the I.G.

With regard to the attitude of the leading men of the I.G. towards
the two Herren von Weinberg before and after 1933 I state the following:

I may state in general that in all circles of the I.G. the
personal attitude towards the Herren von Weinberg was perfectly
correct. As long as they still came into the office they were never
discussed or mentioned in any way. The Herren von Weinberg did not leave the firm until 1936, whereby it must be borne in mind
that owing to their age the two gentlemen had not been active for
many years.

- 2 -

Also with regard to the financial obligations of the IG^{to} the two
Herron von Weinberg, nothing changed after 1933 i.e. until their death,
Both gentlemen, apart from their Aufsichtsrat premiums received each
a yearly pension of RM 80,000,- even before 1933, this was paid out
to them until the time their property was confiscated and the pensions
had to be paid into blocked accounts.

I remember in this connection that the management of the IG-Farben-
industrie, when forced by the government's anti-Jewish regulations,
to pay out pensions and compensations no longer to the Jews directly
but instead to the state, concealed, at its own risk, the annual
pension when stating the obligations towards Herr Carl von Weinberg
and thus was able to let Herr von Weinberg have the benefit of this
amount.

When Herr Carl von Weinberg departed for Italy in 1939, he
was supported by the IG-controlled firm Bianchi in Milan, with the
knowledge of the IG management, an act which was not permissible according
the German foreign currency regulations. A special
to/the authorization would have been required for this which however was

not applied for.
Neernberg, 12 February 1948. signed: Richard von Salviényi.
Austrian Stamp
2 schillings document registry No. 37 for 1948.
This is to certify that the foregoing signature by

- 68 -

- 2a -

Herr Richard von S e i l v i n y i , landed proprietor in Ober-
Jaghaus,
drauburg/Kernten, is genuine.

Greifenburg, 20 March 1948.

Fee \$.

signed: Dr. Karl Maresch
Notary Public

Stamp: Dr. Karl M a r e s c h
Notary Public in Greifenburg
in Kernten

- 68 a -

Affidavit.

I, Richard von Seilwigny, Frankfurt/Main-Niederrad, Goldfriedeck II and Hunting Lodge Oberfauberg 1/Aarnton, have been warned that any false statement on my part will render me liable to prosecution. I declare on oath that my statement corresponds to the truth and was made to be submitted in evidence to the Military Tribunal No. VI at the Palace of Justice, Nuremberg, Germany.

I was a member of the staff of the I.G. Farbenindustrie from 1 April 1930 until May 1945. After the confiscation of the I.G. by the American authorities I took over the management as acting manager of the Cassella Farbenwerke Mainkur which formerly belonged to the I.G.

I met Dr. Georg von Schnitzler in 1927 as a friend of my father-in-law, Dr. Carl von Weinberg. Since then our private relationship has not only been one of the very best but has also developed into a real friendship to which was added, after my entry into the I.G., a constant social contact. As department head of the Farben sales department North America and Canada and, since 1942, head of the Farben sales department Italy, I came into constant contact with him professionally.

As a result of these close business and especially private relations Dr. von Schnitzler came to look upon me as a real confidant, in whose presence he could voice quite openly his criticism regarding the measures

- 2 -

taken by the NS government. I am very much surprised to hear that Dr. von Schnitzler now talks about preparations for an aggressive war of which he claims to have had knowledge, for in the years prior to the outbreak of the war and during the various crises brought about by the NS government (Austria, Sudetenland, Czechoslovakia and finally the outbreak of World War II) he had repeatedly spoken of the catastrophic consequences which would result for Germany and also for the I.G. if Hitler's disastrous policy were finally to lead to another war after all. In the course of a conversation at my father-in-law's house, who at the time of the First World War had still been active in business, Dr. von Schnitzler once explained that the damage which the I.G. would suffer in the field of eyes handled by him, in the event of war, would be many times greater than that suffered after the First World War. The entire personality of Herr von Schnitzler, his helpful, even obliging manner which made him prefer concessions to fights and also his extensive international circle of personal friends made him an adversary to any war by nature.

When after my return from the United States in July 1939 I reported to Dr. von Schnitzler that I had gained the impression that the world war and in particular that the USA would not be willing to let another Czechoslovakia happen and that in my opinion a general war was unavoidable if Poland were attacked, Dr. von Schnitzler was very much shaken. I have never heard him say

- 70 -

- 3 -

that Germany would win the war, on the contrary he was convinced that such a war would end in a catastrophe, the only redeeming feature of which would be that it would put an end to the NS-government. However, especially with regard to the IG and the dye business, he was not quite so pessimistic, but he was of the opinion that after a certain time an agreement would again be reached with the Allies, in this field. He expressed this opinion to me for the last time in January 1945 when I departed for Austria as a result of the severe measures taken against persons of mixed blood (of which I am one), in order to get away from Frankfurt where I was known. He told me that I should try to return to Frankfurt soon after the war, since, due to my knowledge and the fact that I was not politically incriminated, I would be the right person to participate in a leading position in the future discussions which are to be expected.

All difficulties which the Nuremberg laws brought for me, were eliminated either by Dr. von Schnitzler personally or on his instructions by the head of the personnel department, so that I never had any difficulties inside the IG.

In June 1945, on the occasion of the inspection of the Teanus installation I saw Dr. von Schnitzler again. I myself was repeatedly interrogated about the spheres which had been handed by me, i.e. on the instructions of Dr. Weisbrodt I made several statements and translations based on the documents. Although at first I was not given permission to speak to the prisoners I received this later on when it became necessary to discuss the fields in which we had worked together.

- 4 -

hence I also spoke to Dr. von Schnitzler. There is no doubt that the interrogations and according to these description, also the treatment in prison have been such, that it is hardly believable. I noticed at the time that during joint interrogation ^{which} ~~also~~ concerned my scope of work, Dr. von Schnitzler frequently made statements which I immediately contradicted because they were not true, and it appeared that he remembered things quite differently. I was surprised about this since the dye business was his particular scope of work within the IG, I also remember having had to correct his answers to several questions which he had been asked since his answers did not correspond to the actual facts. During these months there was neither time nor opportunity for a personal discussion so that I gained the impression that the catastrophic collapse of the German economy and especially that of the IG and also the prisoner life which he, a somewhat sensitive person, must find particularly hard, had affected him to such an extent that he could not even remember the dye field clearly about which he had usually been completely informed.

Frankfurt/Main
22 September 1947

signed: Richard von Szilvinyi.

This is to certify and attest that the above signature was appended before Herr H. Henze, Attorney at Law, by Herr Richard von Szilvinyi, Frankfurt/Main-Niederrad, Weidfriedstr. 11 and Jagdhaus Oberdrauburg in Saarland.

Frankfurt/Main
22 September 1947

signed: Helmuth Henze
Attorney-at-Law.

a f f i d a v i t

I, Hermann M o h r , born on 9 August 1900 in Wiesbaden, qualified gardener, residing in Frankfurt/Main-Girnheim, Fuchshohl 51, after having been warned that any false statement on my part will render me liable to prosecution declare the following on oath for the purpose of it being submitted to the Military Tribunal in Nuernberg:

I was head-gardener with the former I.G. Farbenindustrie A.G. in Frankfurt/Main from 1936 until March 1946 and I am at present head-gardener at Headquarters Command, Gendqu. EUCOM, Frankfurt.

In my capacity as head-gardener I was under the orders of Dr. Georg von Schnitzler, who was the manager of the Frankfurt offices of the former I.G. Farbenindustrie A.G.

During the war I was entrusted with the task of planting a large scale vegetable garden, in order to provide additional potatoes and vegetables for the plant's canteen. In this vegetable garden in which the shrubs round the former I.G. building were also tended, I had 26 foreign workers, women and men working under me.

During an inspection of the plant Dr. von Schnitzler inquired about the foreign workers who were working for us. I could give Herr von Schnitzler satisfactory replies because all those working for us worked well. During this conversation Dr. von Schnitzler

- 2 -

emphasized that it was my duty to look after the foreign workers well i.e. treat them like German workers, since they had come to Germany as volunteers.

The quarters for the foreign workers were good and were cleaned every day by a woman who had been appointed for this task. The foreign workers were given full rations. The individual meals were plentiful and were handed out to them freshly cooked every day, including Sundays. The foreign workers received also supplementary food-ration cards with which they could buy additional food. German members of the plant collected clothes which were then distributed among the foreign workers. The payment was the same as that of German workers. Some of them even received a bonus for particularly satisfactory work. All foreign workers who had been granted leave in order to visit their relatives in their native countries, returned to Frankfurt. The foreign workers had been specially instructed to seek shelters during Allied air-raids in the same air-raid shelters which were used by the employees of the former I.G. Farbenindustrie A.G. The foreign workers were cared for so well that members of the Party often complained that the I.G. were looking after its foreign workers too well.

Many of the foreign workers employed with us have told me that they felt happy while ^{with} the I.G. because they were treated as free workers in a nice and friendly manner.

Frankfurt/Main, 31 March 1948.

signed: Hermann Mohr
qualified gardener

- 74 -

- 3 -

Number 29 of document registry 1948

This is to certify the signature of Herr Hermann
Kocher, Frankfurt/Main, who is known to me personally.

Frankfurt/Main, 19 April 1948.

signed: Dr. Robert Kuehlwein
(Dr. Kuehlwein)
Notary Public.

Stamp:

Dr. Robert Kuehlwein
Notary Public in Frankfurt/Main

- 75 -

Frankfurt/Main, March 1st, 1948

We, the undersigned, consider it our human duty to certify ^{one} that we know and respect Dr. Georg von Schnitzler, at present/ of the accused in the I.G. Farben-law-suit before the American High Tribunal at Nuremberg, as a person with a kind heart and with a liberal disposition in social matters. His advice and help was open to everybody, from the smallest workman and employee up to his colleagues on the board of directors of the former I.G. Farbenindustrie A.G., now "in dissolution", and we believe that rarely a man left Dr. von Schnitzler's office without help or good advice. His social feeling did not stop at the welfare of his compatriots, but included the interests of the workers of foreign origin who were employed during the war in the service of the central office building in Frankfurt / Main, as can be seen from the separate declaration of Mr. Mohr who has also signed this statement.

Dr. von Schnitzler enjoyed international esteem, as Man and as representative of his company. His utterances in negotiations, always weighty and in a spirit of mutual understanding and professional decency, were listened to with attention wherever they were heard. Nobody among us deems Dr. von Schnitzler capable of a wicked action or cruelty. Politically Dr. von Schnitzler was under the same terror as any other German, especially men in prominent positions. Whilst it is the task of the Court to establish a personal guilt, resulting from this situation, and to prove single actions of breach of the laws of humanity and of international covenants, we, Dr. von Schnitzler's former collaborators, business-friends and subalterns entreat the High Tribunal

-2-

to take into consideration in its deliberations and decisions the unblemished past of Dr. von Schnitzer, and the fact that he stood, during a period of criminal coercion by his own government, at the head of a vast commercial and industrial enterprise and was responsible for the fate of thousands of workers and ^{of} gigantic material values, without having the protection of such a unique and august document as the American Constitution.

Emil A. Fester,

signed: Emil A. Fester

Business-manager of the Sulfatvereinigung G.m.b.H.,
Frankfurt/Main in retire since 1 January 1945.

- - - -

No. 16 of the document registry for 1948

This is to certify the correctness of the signature appended
in my presence by Herr Emil A. Fester who is personally
known to me.

Frankfurt/Main, 28 February 1948

(stamp)

signed: Dr. Robert Kuehlewein

Dr. jur. Robert Kuehlewein

Notary Public.

Notary Public in Frankfurt/Main

- 4 -

Werner Hart, s/Werner Hart
until 31 August business manager
of the distribution office for
chloride of lime (Deutsche Chlor-
Konvention) "in liquidation".

s/Hermann Ergmann
Hermann Ergmann,
Business manager of the Elektro-
Chemische Produkte G.m.b.H.,
retired since 1945.

- - - -

s/Karl Weigandt
Karl Weigandt, Director

s/Dr. Julius Rath,
Dr. Julius Rath,
Prokurist, retired.

s/Dr. Julius Overhoff
Dr. Julius Overhoff, Director

s/Georg Böttner
(Georg Böttner, employees'
representative in the Aufsichts-
rat of the I.G. until 1933)

s/Frieda Parro,
Frieda Parro, real estate
administration

s/Josef Schmitt
Josef Schmitt, architect

s/Hela Dubois,
Hela Dubois, secretary to the
management

s/Hermann Mohr
Hermann Mohr, head-gardener

s/August Thon
August Thon, janitor
main office building
Frankfurt/Main

s/Arthur Borg
Arthur Borg, prokurist, retired

s/Margarethe Auffahrt
Margarethe Auffahrt, secre-
tary

s/Emil Koppen
Emil Koppen, director, retired

s/Richard Schlatter
Richard Schlatter, prokurist,
retired

s/Hermann Voss
Hermann Voss, representative
Prokurist

s/Sebastian Harsag
Sebastian Harsag, represen-
tative with limited power of
attorney, retired

s/Willy Ploines
Willy Ploines, representative
with limited power of attorney

s/Walter B. Meier
Walter B. Meier, represen-
tative with limited power
of attorney

s/Ludovika Koch
Ludovika Koch, secretariat
of the management

s/Aug. Ernst, August Ernst,
representative with limited
power of attorney

s/Ernst Osborn
Ernst Osborn, representative with
limited power of attorney, ret.
s/Franz Reinhard, Franz Reinhard,
management department-Farben

- 79 -

s/ Wilh. H. Schneider,
Wilhelm H. Schneider,
prokurist

s/ Amandus Ott
Amundus Ott, travel bureau

s/ Karl Kissner
Karl Kissner, driver

s/ Hans Uber
Hans Uber, personnel department

s/ Georg Kurr
Georg Kurr, Konvention-
clearing house.

- - - -

I, the undersigned Emil A. Foster, herewith declare - on
oath of oath - that the above-named persons have all- with the
exception of Messrs. Mart, Ergmann and myself - been in the em-
ploy of the former I.G. Farbenindustrie A.-G., now in dissolution,
and that they have all personally and with their own hands affixed
their signatures to this document, in my presence. The same has been
done by myself, Messrs. Mart and Ergmann.

Frankfurt/Main, April 18th, 1948

signed: Emil A. Foster,
Emil A. Foster,

Manager in retirement of the former Sulfatvereinigung G.m.b.H.,
Frankfurt/Main and Berlin.

No. 35 of document registry for 1948

The signature of Herr Emil A. Foster, Frankfurt/Main, per-
sonally known to me, was appended in my presence and is
hereby certified.

Frankfurt/Main, 22 April 1948

signed: Dr. Robert Kuchlewain
Notary public

(stamp:)

Dr. Robert Kuchlewain
Notary Public in
Frankfurt/Main.

A f f i d a v i t .

I, Dr. Wilhelm D o e r i n g, born on 14 August 1887 in Karlsruhe, Baden, at present residing in Bremen, Hanstr. 90, know that I render myself liable to punishment if I give false testimony. I hereby declare on oath, that my statements are true to the best of my knowledge and belief, and that they were made in order to be submitted as evidence to the Military Tribunal in Nuremberg.

Since 1913 I belonged to the executives of the various top organizations of German industry, which succeeded each other in the course of the decades, and when the former Reich Association of German Industry was converted into the Reich Group Industry at the end of 1934 I was taken over as a department chief. As such I was employed until 1 January 1944.

With regard to the introduction of the so-called German greeting in the Reich Group Industry i.e. the Reich Association of German Industry I can only recollect, in view of the complete lack of documents, that the use of the phrase "Heil Hitler" under letters and circulars was once suggested, following an order by higher authorities which was thereby passed on.

In practice these words became just as much a phrase as for instance "Yours truly", or "Yours faithfully". I cannot imagine that anybody using them took them for more than just a phrase. To offer a "German greeting" i.e. a kind of homage to Hitler with these words could

hardly have occurred to anybody, just as after all, one uses the words "Yours truly", or "Yours faithfully" in business life for people for whom one does not feel any such sentiment. Besides this order as regards the signatures on letters or circulars I do not recollect any measures the former president of the Reich Association of German Industry or later the Reich Group Industry may have taken to enforce the use of the German greeting, and I do not think that there have been any.

As regards the alleged propaganda for the leader principle by Herr v. Bohlen, I can only say that based on my observations during the many years of Herr v. Bohlen's office, such a tendency would have been quite out of keeping with Herr v. Bohlen's personal attitude. The Reich Group Industry was established at the end of 1934 in accordance with directives from the Reich government. That these directives from above were based on the leader principle can hardly be a surprise in view of the basic political attitude of the Reich government. In actual fact the Reich Group Industry changed over very quickly to the formation of groups for the purpose of determining opinions, and in this way circumvented the leader principle which was probably recognized as unsuitable for economic life in wide industrial circles. My impression is that the Reich government looked upon the Reich Group Industry more or less as a body of honoraries. Throughout the 12 years of the national-socialist regime the Reich Group Industry had to defend itself

-3-

against interference from the Reich government and indoctrination attempts of the Party. Particularly in organizational matters it was repeatedly in the very difficult position of being a ~~medium~~ ^{most} ~~medium~~. This was felt ^{most} strongly during the last years of the war when the Speer Ministry interfered more and more with the organization of the Reich Group Industry and tried to exert its influence on its activities. In the same way the Reich Group Industry was in ~~grave~~ ^{constant} conflict, with other Nazi government offices for many years. This applies particularly to the German Labor Front, the Ministry of Propaganda, and the Propaganda Council for German Economy, to whose measures I was especially exposed, being the head of the department which was in charge of economic propaganda.

Shortly before I retired the Association for the Promotion of German Economy was formed as a measure to insure as far as possible the independence of industry as regards the promotion of scientific organizations, research institutes, etc. from interference on the part of the Party, and to enable it to make decisions on a purely objective basis.

I have carefully read the above affidavit and signed it personally.

Bamberg-Ottmarschen, 12 March 1948

signed: Dr. Wilhelm Doering
(Dr. Wilhelm Doering)

Signed before me by Herr Dr. Wilhelm Doering known to me to be the person making the above affidavit.

Nuremberg, 3 May 1948

signed: Dr. W. Siemore
(Dr. W. Siemore)

DOCUMENT BOOK XI SCHNITZER
EXHIBIT No.

CERTIFICATE OF TRANSLATION

7 May 1948

We, John FOSBERY, No. 20179, Gerta KANNOVA,
No. 20151 and Kathleen BRAMLEY, No. 20096, hereby
certify that we are thoroughly conversant with
the English and German languages and that the above
is a true and correct translation of the Document
Book XI Schnitzler.

John FOSBERY,
No. 20179

Gerta KANNOVA,
No. 20151

Kathleen BRAMLEY
No. 20096

(END)

CASE NO 6 - TRIBUNAL VI

DEFENSE

Document Book No. 12 - Schnitzler

English

277-1001



Schnitzler Document Book No. 12 submitted in German only.
Documents Schnitzler 108 and 109 (contained in Ger. Doc. Bk.
Schnitzler 12) are included in English Schnitzler Document
Book 7.



Case 6
Schnitzler

DOCUMENT BOOK XIII

for

Dr. Georg von SCHNITZLER

Submitted to the
MILITARY TRIBUNAL VI
IN CASE VI

by

DR. Walter SIEVERS,
ATTORNEY AT LAW IN HAMBURG



I N D E X

of the Document Book XIII

Supplementary volume to Francolor, Winnies and Pressure
for Dr. Georg von Schnitzler.

Documents 189, 220 - 223, 225, pages 1 to 56.

Schnitzler No.	Exhibit No.	Description of document	page
<u>Ad: Francolor.</u>			
189	214	Questionnaire with answers by the Swiss subject Carl KOEHLIN, Basel, re. international negotiation in the sphere of dyo-stuffs, as well as SCHNITZLER'S personal attitude towards National Socialism and the outbreak of the war	1 - 8
220	219	Letter from the Swiss subject KOEHLIN to Dr. von SCHNITZLER, dated 24 October 1940: Efforts made by FROSSARD to get into touch with the I.G. FROSSARD is visibly relieved when he hears from KOEHLIN that SCHNITZLER had already stated his intention of contacting the French.	9 - 11
224	222	Excerpt from the American book, "A Diplomatic history of the American people", regarding the legality of the Vichy-government.	12 - 14

Schnitzler No.	Exhibit No.	Description of Document	Page
<u>At: Winnica.</u>			
221	220	Letter from Director SCHWAB and SCHOENER to the Reich Ministry of Economy, dated 6 October 1939, containing report no. 1. The letter shows that the two directors do not report to the I.G. but to the Reich Minister of Economy on account of their position as trustees.	15 - 19
222	221	Decision of the Plenipotentiary for the Four-Year Plan on the unblocking of the Winnica's assets, as the Winnica. "is not a Polish enterprise today, and was not one before the war."	20 - 21
<u>At: Pressure.</u>			
223	182	Excerpts from the interrogation records of the "witness" Dr. Georg von SCHWITZER by Mr. SPEICHER, dated 18, 19, 20 and 22 February 1947. In connection with document SCHWITZER no. 26, Exh. no. 26, in Doc. Book II, the excerpts show that considerable mental pressure was applied to SCHWITZER. After these first transcripts were taken down it was neither pointed out to SCHWITZER that he would be indicted, nor that he had a right to withhold information as far as it incriminated him; pressure was applied to him by reference to the Control Council Law, whereby every German is under an obligation to give information to the Occupying Powers, as well as by the manner in which reference was made to the consequences of committing perjury, whereby advantage was taken of the affidavit given involuntarily in 1945.	

SCHNITZLER No.	Exhibit No.	Description of Document	Page
223	182	Pages 11/12 of this document: Schnitzler's request to be allowed more time to think things over is refused. Page 19 of this document: Schnitzler breaks out in tears, in connection with a discussion on responsibility towards God or humanity, and not as the witness WOLFFSOHN stated in court on 10 May 1948, in connection with the death of millions of people.	22 - 41
225	223	Statement by Dr. Gustav KUEPPER, dated 30 August 1947, re. pressure. The interrogator, Mr. SAKHS, declares, "Think of your poor wife and your poor children, what will happen to them if you persist in your attitude." Threats that the witness will be handed over to a Soviet liaison officer who will apply well known Soviet methods of interrogation and a threat of "deportation to Siberia with the reference that I had experience in the creation of new factories and that the Russians could make good use of me."	42 - 49

Re. Alsace - Lorraine.

213	218	Affidavit by Walter LUDWIGS re acquisition of the oxygen plant in Alsace-Lorraine. 42 - 51 <i>to be furnished in Ex. 10 pg 105</i>	
-----	-----	---	--

I, Dr. Walter SIEMERS, attorney-at-law in Hamburg, at present counsel for the Defense at U.S. Military Tribunal in Nuernberg, herewith certify the following:

1. The appended document contains the reply of the Swiss citizen Carl KOSCHLIN to my questionnaire which I submitted as Document 189 in Document Book SCHNITZLER No. X, together with my letter dated 8 April 1948 to the Military Tribunal, for the attention of Major SCHAEFER, with the request that the questionnaire be forwarded to Herr KOSCHLIN.

2. The appended questionnaire, filled in and signed by Herr KOSCHLIN, was sent to Major SCHAEFER by Herr KOSCHLIN together with the letter dated 27 April 1948. This letter is also included in the appended document. I herewith certify that this appendix is a true and faithful copy.

3. I received the original of the appended document and accompanying letter from Major SCHAEFER on 6 May 1948, so that I could submit both to the Tribunal.

Nuernberg, 6 May 1948

(Dr. SIEMERS)

DOCUMENT BOOK XIII, SCHNITZER
SCHNITZER DOCUMENT No. 189
EXHIBIT No. 214

Charles E. KOECHLIN

BALE, 27 April 1948
27 Gallert

Robert G. SCHAEFER, Major
Chief of Defense Center,
Office of Military Government (US)
Secretariat for Military Tribunals,
Ruernberg, Germany
APO 695 A, U.S. Army.

Dear Sir:

In reply to your letter of 9th April 1948, I herewith
return to you the communication by Dr. Walter SIMONS as well
as the enclosures with my answers.

For order's sake I wish to state that I have replied to
this inquiry as a private person and not in my capacity of
Vice-President and Managing Director of my firm nor as representa-
tive of any other concerns or organization.

Very truly yours,
signed: KOECHLIN

Enclosures

QUESTIONNAIRE

for the

Swiss citizen

Herr Carl KESCHLIN

c/o firm J.R. GEIGY A.G., Basel/Switzerland.

1. What was or is your position in the economic field

- | | | |
|----------------------|---|----------------------------------|
| a) prior to the war? | } | Vice President and delegate |
| b) during the war? | } | of the Administrative Council of |
| c) after the war? | } | J.R. Geigy A.G., Basel |

2. How did your relationship with Dr. v. SCHWITZLER originate?

- a) Did you know him privately prior to your business connection?

Answer: No.

- b) When did you take up business relations with Dr. v. SCHWITZLER?

In what connection?

Answer: As far as I remember, in the middle of the twenties
in connection with business questions concerning the
management of J.R. Geigy A.G.-transactions in
Germany and its plant at Griesbach (Baden) in
particular.

- c) In what intervals and in which manner did your relationship
to Dr. v. SCHWITZLER extend in connection with business
questions?

Answer: In regular intervals, taking into account the general economic and special business development of the dyestuff industry, resp. the interests of the firm J.M. Geigy A.G.

- d) What was Dr. v. SCHNITZLER's position in business conferences? What was yours?

Answer: We either acted as representative of our enterprises or, in discussions which exceeded the interests of both firms, as representatives of the groups participating in the negotiations.

Did Dr. v. SCHNITZLER and you take an equal share in these conferences and business contracts or agreements?

Answer: Yes, in my opinion.

3. What was Dr. v. SCHNITZLER's personal attitude in the meetings he had with you in connection with the handling and settlement of business problems, and what part did he play on these occasions?

Answer: He was always perfectly fair and loyal, generous and obliging, and he furthermore tried to appreciate the other party's opinion and position; he also frequently acted as mediator in the same sense.

4. What was, in your opinion, Dr. v. SCHNITZLER's position within I.G. Farben A.G., i.e., what was - according to you - his position in this Konzern?

Answer: The official position is well known. I cannot say with certainty to what extent his official position was in keeping with his internal position or his internal influence.

However, it seemed to me that his strength - externally as well as internally - was due mainly to his obliging character, his readiness to defend his colleagues and subordinates, his numerous connections and a certain skill in the handling of people. It was probably in view of these qualities that his colleagues liked to commission him to negotiate with the representatives of other groups and firms.

5. How did you, from the Swiss point of view, regard the fact that Dr. v. SCHNITZLER as representative of the I.G. negotiated with you, and conducted international commercial negotiations in the dyestuff field in general?

Answer: There were no objections personally or materially although it was felt repeatedly that he was not always quite fortunate in the handling of material questions and people, the reason being, to my mind, that he did not always quite master his subject and did not always judge the mentality of certain people correctly.

6. How did Dr. v. SCHNITZLER conduct the negotiations with your firm, with the Swiss dyestuff industry and with similar firms abroad?

Answer: He was loyal, fair, obliging, broad-minded and appreciative. He was always prepared to discuss matters frankly if there were any differences of opinion. He did not adhere to his opinion under all circumstances.

but was always accessible to suggestions.

In these negotiations, did Dr. v. SCHNITZER ruthlessly take advantage of economic possibilities for the IG or did he recognize the interests of foreign firms and negotiate with compliance?

Answer: As far as I can say, he did not ruthlessly take advantage of economic possibilities, but recognized the interests of foreign firms as far as possible; he showed compliance in the negotiations. He was personally generous.

7. Did Dr. v. SCHNITZER exert political or National Socialist pressure in the negotiations?

Answer: No. In rare cases, however, he pointed out that he had difficulties owing to the interference of National Socialist agencies and that he was occasionally subject to Party pressure. He repeatedly told me that he was always watched and spied upon.

8. What is your general opinion as to Dr. v. SCHNITZER's personality, taking into account his position abroad and in international negotiations?

Answer: He had a position and responsibilities to which he was not equal in every respect. He was a little superficial occasionally and sometimes he did not explore the subject matter sufficiently. He therefore did not always entirely master his subject and sometimes also allowed himself to be influenced relatively easily.

above all by superficialities. This was also due to the fact that he was a snob in certain respects. Thus, I think, it can be explained why he did not right from the beginning oppose higher Party authorities with the firmness, or at least with the reserve which, as far as I can judge, actually corresponded with his private opinion. With regard to his position he gave himself an air which was not always in accordance with his actual abilities. This may perhaps explain the fact that in negotiations with Anglosaxons, particularly with Americans, he was not always popular and therefore not always judged particularly favorably. At such negotiations and discussions he easily became rather talkative and floundered about, partly because he was speaking in a foreign language. This did not suit the Anglosaxons and he was therefore often misjudged by them.

9. What was Dr. v. SCHNITZLER's attitude towards National Socialism?

Answer: In my opinion absolutely negative, but he made mistakes, partly for reasons he mentioned sub 8 and partly because he thought that in his position with I.G. Farben he could not simply keep aloof from the political events.

10. Did Dr. W. SCHNITZLER talk to you at any time before or after the outbreak of war about his attitude towards National Socialism, and his opinion of it, and if so, in which sense?

Answer: Yes. When he did so, it was as follows: At the beginning he was perhaps not absolutely opposed to the movement and perhaps assisted it as long as he was of the opinion that it was a fight against unemployment and communism. Later, however, after he had recognized the true character of the movement, he rejected it both from a political as well as human point of view.

11. Did Dr. W. SCHNITZLER talk to you at any time before or after the outbreak of war about the situation in Germany (perhaps in reference to the Munich Agreement of 29 September 1938, the occupation of Prague in March 1939, or the dangers of war which were often discussed in 1938 or 1939)?

Answer: Yes. At the beginning of the war he was perhaps dazzled by the successes of the German arms. On the other hand when Prague was occupied and he had to negotiate the adjustment of the Hussite Monastery, and also on two other occasions during the war, he did mention his worries to me. He then spoke sharply against certain inclinations of the National Socialist movement, and against its aims which he thought dangerous to Germany. As far as I could see, he himself, from the middle of the war onwards, had no doubts about the outcome of the struggle.

Basel, 27 April 1948

signed KROCHLIN

I, Dr. Walter SIEMERS, attorney-at-law at Hamburg, at
present counsel for the defense at the American Military Tribunal
at Nurnberg, hereby testify that the enclosed

Document No. SI-9870

is a true copy of a photocopy which was put at my disposal
by the Prosecution (Room 316).

Nurnberg, 6 May 1946

(Dr. Siemers)

Doc. No. 51 - 9370

CARL W. KROEPLIN

Basel
27 Gelburt (1)
at present Bern, 24 October 1940

(handwritten:)

"Settled by telephone"
Initial: VS. 4.XI.

Dr. Georg von SCHNITZLER
c/o IG Farbenindustrie
Aktiengesellschaft
Frankfurt/Main

Dear Doctor,

I told you at Zurich that Dr. FROESCHKE announced his intention of visiting us. We met him yesterday. He came with Dr. ROESLER to Guehy. Besides myself Dr. WILHELM and Dr. STOSS also took part in the conversation.

Dr. FROESCHKE was extremely depressed, this was very apparent both when we met him when he parted.

The talks were quite informal, and took place in a very friendly and calm atmosphere. Herr FROESCHKE and Herr ROESLER - without making any sharp remarks - expressed their regret with respect to the fact of their country and the conditions there.

As to business, under prevailing circumstances, there was only a general interchange of ideas. Herr FROESCHKE said he would like to resume contact with us in the near future.

As then repeatedly inquired as to your general attitude, and he was visibly relieved

when he heard that you had talked to me about your intention of resuming contact with him. When I asked him whether I should write you a few lines to the effect that he too would like to contact you again, he gladly accepted my proposal and asked me to do so. This is the reason why I am writing now and I suppose that you will take further steps in the matter yourself.

However, should you, for one reason or another, wish me to write another note to Herr Fuchs, I am, of course, at your disposal, and will do so with the greatest pleasure.

with sincere greetings,

Yours faithfully

signed KUBCHLIN

I, Holmuth HENSEL, Attorney, at present defense Counsel
before the American Military Tribunal in Nuernberg, hereby certify
that the attached document

The Fighting French

is a verbatim excerpt from the book,

A Diplomatic History of the American People

-- by

Thomas A. Bailey

Stanford University

Third Edition

New York 1947

S. F. Crofts & Co.

Nuernberg, 10 May 1948.

(Signature): HENSEL

(Holmuth Hense)
Attorney

Excerpt from:

A Diplomatic History of the American People

Thomas L. Bailey

Stanford University

Third Edition
New York 1947

S. F. Crofts & Co.

• Page 812:

.....
The Fighting French

Cooperation with France, no less than with Russia, presented the Western Allies with many delicate problems. The large Northern and Western Part of France occupied by Hitler in 1940 was clearly enemy territory; the technically neutral remainder, including an important overseas empire, was left under a quasi-independent government set up at Vichy under the head of Marshal Petain, an eighty-four years old hero of World War I. Conspicuous among those struggling for power behind this bemuddled throne was the swarthy Pierre Laval, who openly consorted with Nazis.

Outside France, a determined band of French patriots, led by the zealous but austere General Charles de Gaulle, maintained headquarters in London, defied the so-called collaborationists policy of the aged Petain, and feebly kept aloft the tarnished banner of the republic.

Vichy was the only legal government of France, and as such the State Department continued official diplomatic relations with it, though openly deploring the growing influence of

- 2 -

Hitler. Grinfaced Secretary Hall was subjected to savage criticism for nearly a year because he would not break off relations with Petain and Laval, and because his policy smalled suspiciously like "appeasement".

DOCUMENT BOOK XIII SCHMITZLER
SCHMITZLER DOCUMENT No. 221
EXHIBIT No. 220

I, Dr. Walter SIMERS, Attorney in Hamburg, at present Defense Counsel before the American Military Tribunal in Muernberg, hereby certify, that the attached

Document No. MI - 6887

is a verbatim copy of a photostat, which the Prosecution (Room 316) has placed at my disposal.

Muernberg, 8 May 1948.

(Dr. Simers)

SI-8867

Director Hermann SCHLUB, Frankfurt/Main,
Director Bernhard SCHLUBER, Delfen
Actually L. D. 1, Sienkiewicz 55

Lodz, 6 October 1939

To the
Reich Ministry of Economics
Berlin

through:
Chief of Civilian Administration of the Army High Command,
War Economy Department
at L. D. 1.

Subject: II Chem. 13 364/39. Polish Dyestuff Factories.
Report No. 1

Zakłady Chemiczne w Tarnobrzegu, Silesia, near Warsaw.

Pursuant to the order given us in Berlin on 27 September, that
on account of the imminent danger of an occupation by the Russians,
we should endeavor as rapidly as possible to evacuate and bring
into security the stores of dyestuffs and other products from the
dyestuff factory which is situated on the right bank of the
Vistula near Jablona, about 15 kilometers north-east of Warsaw,
we went to Danzig, reporting there to the local War Economy
Office, and from there by hired car via Radom, Warsaw,
Masovia to Jablona. We arrived at Jablona on 30 September,
about 9 a.m. We reached Tarnobrzeg at 10.30 a.m. and found the
factory completely undamaged.

On the whole, the factory is perfectly ready to be put
into operation. However, work cannot be started for the time

being as at present only electric light is supplied from 7 p.m. to 9 a.m. whilst power cannot be obtained as yet.

On the basis of the former production program there is enough coal as well as raw materials for about 6 months. This coal can be used for steam production and for heating purposes, but only provisionally and to a small extent for power production.

In our opinion there is no question of an immediate re-opening of the factory for the following reasons:

1. the aforesaid lack of power supply,
2. in view of the situation in and around Warsaw the complete lack of all means of transportation for articles which are not essential to the war or to everyday life.
3. The absence at present of technical personnel; the two engineers of the factory have been drafted as Polish officers and have not yet returned,
4. the large and completely undamaged stocks of dyestuffs which were formerly produced, the selling possibilities or utilization of which we have not as yet been able to submit to adequate survey.

We have in our possession lists of the stocks of prime products, semi-manufactured and finished products which were in hand on 1 August 1939. The office staff is busy drawing-up an inventory based on the books as of 1 October 1939, including the stocks of technical auxiliary materials of all kinds, and this will be followed by real stocktaking done under our supervision.....

After a discussion with the manager of the innica, Dr. HIRSZOWSKI, who has been known to the first party signing this report for years and who, we really must say, has shown in every respect the fullest understanding for the situation, we have ordered:

1. that those lots of dyestuffs which are actually in the process of manufacture, shall be finished as far as possible with the little power there is left, to save them from being spoiled;
2. that the existing personnel shall be employed on the repairs which are necessary in view of the coming winter.

Re-employment of returned personnel will have to be discontinued for the present for the above-mentioned reasons and on account of the insufficiency of available funds,

.....

Of the Zloty 9.735.-- appropriated for salaries of employees for the month of October, Zl. 5.330.-- represent the monthly payment according to agreement of works Chief Dr. HIRSZOWSKI and Zl. 2.200.-- that of Deputy Director STYWE'SKI, who is in charge of the commercial administration.

As, in our opinion, the preservation of the total value of Winnica is due only to the exemplary attitude of these two employees we consider it justifiable to leave as it was their salary as well as that of all other members of the staff who remained at their post. We shall shortly request directives from the Chief of Civil Administration at the Armee Oberkommando as to the future treatment of salaries for the technical and commercial management and the remaining personnel and workers.

As to commercial requirements we have inspected all books and have initialled the last completed entries.

We shall request the Chief of Civil Administration to give us help and advice in withdrawing from unauthorized appropriation considerable funds deposited with private banks.

Having ascertained through the intervention of the Jablonski Ortskommandantur the locality of the Civil Administration of Armeekorpskommando 3 at Segras-Segrove we called on Herr von REDELSTEDT, Chief of Civil Administration of Armeekorpskommando 3 reporting to him on our recent operations. In a short written file-note it was stated that we took over the provisional administration of Winnick at 12 o'clock noon of 30 September 1939.

As soon as possible a report is to follow on our activity with the firm Braunsfel Shermans "Gerath" begun on 5 of the month.

HI-5835

(stamp:) 11 June 1942

1st version.

The Plenipotentiary for the Four Year Plan
Main Trusteeship Office East
(Haupttreuhandstelle Ost)

Special Department Old Reich (altreich)

Berlin NE 87, 7 May 1942
Klopstockstr. 52
Telephone: Switchboard
535431

File No: 18 356

M/E.

Value according to registration on
3 January 1941 RM 155.865.09

Cancellation of seizure and confiscation.

I herewith cancel my seizure and confiscation of 26 August 1941
of the current account credit balance of the
Chemische Werke in Minnia S.G., Minnia
with the IG Farbenindustrie Aktiengesellschaft, Frankfurt (Main),
Grubenburgplatz,
because in virtue of a report by the Generalgouvernement, District
Chief in Warsaw, of 9 April 1942, file No.: journal No. 73 - 85/42
Dr.-/Th., the firm of Chemische Werke in Minnia S.G., Minnia,
is not a Polish enterprise today nor was it before the
outbreak of the war.

By order

signed: Dr. REITZ

issued:
(signature:) SCHEFFLER
Office Clerk

To
I.G. Farbenindustrie Aktiengesellschaft,
Frankfurt (Main)
Grubenburgplatz

Registerrudl

I, Dr. Rupprecht von KELLER, Counsel for the Defense at the
American Military Tribunal at Nurnberg, attest herewith that above
document is a true and verbatim copy from its photostat put at
my disposal by the prosecution.

Nurnberg, 7 May 1948

signed Dr. R.v. KELLER
(Dr. R. von KELLER)

I, Dr. Walter SIEBERS, Attorney at Hamburg, at present Counsel for the
Defense at the American Military Tribunal at Nurnberg attest herewith
that enclosed document

accord of examination by Dr. SPRECHER of the
defendant Dr. Georg von SCHNITZLER on 18, 19, 20
and 22 February 1947

is a true and verbatim copy of excerpts from the examination-
records which the Prosecution put at Dr. von SCHNITZLER's
disposal and which Dr. von SCHNITZLER handed to me.

Nurnberg, 9 May 1948

(Dr. Siebers)

Interrogation of Mr. Georg von SCHMITZLER
by Mr. Drexel A. Sprecher, 18 February
1947, 1550 - 1715, Room 166, Palace of
Justice, Saarberg, Germany.

Also present: Mr. Albert G.D. Levy,
Mr. Julius Rudolph, Mr. Zenen de Obetnik
Miss Rita M. Gaylerd, Court Reporter.

TO THE WITNESS BY MR. DREXEL A. SPEECHER:

Page 1

Q.: The law of the occupying powers concerning failure to tell
the truth is very stern to falsifiers. The law concerning the fail-
ure to disclose the truth is very stern to perjurers or falsifiers-
persons who tell falsehoods.

Q.: Some penalties for perjury may be graver than those for
involvement in German militarization. Now, there have been some alle-
gations that you and several of the persons with whom you have
recently taken counsel have laid aside your scruples concerning the
truth in some of your dealings with the occupation forces and that
you have either made understatements or overstatements.

Page 2

Q.: When you have believed that your personal position could
be improved by such falsification; further, that you have been
quite willing to conceal the truth behind the fine phrases and
diplomatic language of a very learned gentleman, and that you,
personally, acquired this art through years of

negotiations, both in Germany and abroad. The allegations even run to the extent of asserting that you, on occasion, swore falsely or that you have been willing to tell untruths before representatives of the occupying powers. If this is so, I suppose I need not inform you that action will be taken accordingly.

.....

Q: Now, if original documents should demonstrate that you have given falsehoods or if the testimony of credible witnesses should prove that you intentionally concealed the truth, any punishment meted out to you will account separately for your perjury — for your falsifications. Perjury, you understand, is the legal word for not telling the truth.

Q: When you say you told too much, it seems rather strange. That is one of the things I am concerned about that perhaps you haven't told enough.

.....

Page 4

Q:

If you now disclose any falsehoods which you have made, such disclosure at the present time may be considered in mitigation of any punishment. If charges of any kind are later brought against you, you will then be allowed the privilege of having legal counsel, which is the custom of the occupying powers.

.....

Q: Until such charges are brought or unless such charges are brought, occupation procedure as applied here gives you

no right to counsel. Furthermore, under occupational law, after the cessation of hostilities, you as a citizen of the occupied country are required to cooperate with the occupying authorities according to proper requirements demanded of you.

.....

Page 8

Q.: Just a point now. We have been advised that at least recently you have indicated that you are strictly a God-fearing man.

A.: I don't understand.

Q.: That you believe in God.

A.: Yes, I am a very, very convinced Christian.

Q.: And when you say that you have thought over these things that you disclosed to the investigators, which is Weissbrodt and Divine or others, you can state freely that on your conscience before God you have no feelings that you made any intentional falsifications?

A.: No intentional falsifications; not the least, not the least, but on the contrary. And I am very grateful that we can clear that up, and that is not my fault and neither Mr. Weissbrodt's fault, who is a very, very highly intelligent man, but in his desire to disclose quickly this enormous field of action, he tried to bring my memory back and he said partly - he said jokingly - he said, "You see, in talking with you I have first to have a good luncheon and then I have to pull it out from you in order to get in all these demands.

.....

INTERROGATION OF MR. GEORG VON SCHNITZLER,
by Mr. Drexel A. Sprecher, 19 February 1947,
1000-1230, Room 156, Palace of Justice,
Munich, Germany.

Also present: Mr. Albert G.D. Levy, Mr. Zenon
de Chetnik; Miss Rita Gaylord, Court Reporter.

TO THE WITNESS BY MR. DREXEL A. SPECHER:

Page 4

A.: Yes. There is of course — these statements are right, and I couldn't say anything else nowadays. But if this is all entirely correct in fact, that I don't know, because you find it always here that I only speak of my opinion. It was only my opinion, because my knowledge was absolutely restrained on that matter. I said in one of the other domains— you know, I am from the beginning, as you had it yesterday, a dyestuffman.

Q.: I am quite familiar with these things. It won't be necessary for you to go into detail. We have many records in the hands of the Americans at the time you were previously interrogated, and I think that you very clearly understood my objective. You have now read through three documents which have been clearly identified. You have certified to the subscription of these documents. Now I don't wish to hear from you "This may be generally a matter of my opinion, and therefore I could have been wrong." That is what we call weasel words. You're familiar with the American term. A weasel is a little animal that runs into little holes and out of little holes.

A.: Yes, if that is a weasel, yes.

Q.: Now, we call these "weasel words". Will you point out any statement therein which you now say is false.

A.: No, there is nothing false. That was as I had the opinion at the time.

Q.: You read the document over again. If you see anything that you think is false, either as to fact or opinion specifically, then let's hear about it, but it does not help the record or your position to just make a lot of weasel words — a lot of generalities. It's just as if you had not answered at all.

.....

Page 14

Q.: Mr. von SCHNITZLER, perhaps you didn't understand my question. I will ask the stenographer to read it to you.

(Stenographer reads question)

Now, my point is that you have reduced to writing here, in the interrogation to which you have sworn, your conclusions concerning the matter of who should produce oil and who should make chemical products, and you have discussed it as an I.G. Farben matter which seems eminently reasonable to me in this connection. Now the question is very simple. It doesn't really require, it seems to me and I think whoever reads the record will have a similar feeling, anything more than for you to decide whether or not

.....

Page 20

Q.: And during this regime, you constantly had to live under a number of pretenses, is that correct?

A.: Window dressing, yes.

Q.: Window dressing, which in its own nature is to be misleading - which in its very nature is to be misleading to somebody, is that correct?

A.: That can be, yes.

Q.: Now do you think that the habits of 12 years, to say nothing of any other habits which you may have acquired in international negotiations, which were sometimes necessary so as not to disclose your full hand, have permanently affected your character?

A.: No, I don't think so.

Q.: Well, I think that we have a very short period in which we find that out because it's not too difficult a question. It is a question of directness, and if the record stays vague and ambiguous, full of pretences, full of vagaries, full of this type of deviation and that type of deviation, you go back to your cell and ask yourself: "Mr. von SCHENKEL, where do you come out before God, before people judging you for what you say under oath, before your own people and before the world?"

A.: Yes, that is right.

Q.: Perhaps we should let you go back and think about that.

A.: Thank you very much. I will go over this whole domain again because it's so involved. I can only repeat that it was always my endeavor and my only purpose.

to tell the truth to these American interrogators and I think we shall prove that when you go over all the facts that I always said the truth, but what you're going through now, that is indeed a most difficult domain which I have been asked because I am not certain at all in the domain and so many ideas - possibilities - cross my mind and still cross my mind that at the present moment still I am in a certainly difficult position about the final results of that all.

Q: Now I haven't even begun to come to what I consider some of the big points here, but I am surprised that concerning such a little point as this one here concerning a policy which you as a Vorstand member enunciated in fairly general terms -- general but clear -- you have been unable to make yourself articulate to me, and instead have filled the air here with long and worried discussions in which you start to talk about everything else. It looks very strange to the person viewing your answers, you see. It's either that you had this opinion in 1945 based upon what you had learned in the normal course of your dealings with the Vorstand -- with the Dironts, with Mr. ter Meer -- or you didn't. Now you answer to that fairly simply: I take it that was your opinion on the basis of the history as you know it in July 1945, is that correct?

A: That was as it was rooted in my memory and my brain.

Q: Right. It was rooted there after years and years and years.

A: Yes.

.....

Q. Well, Mr. von SCHNITZLER, a number of innocent people concerning Far en have passed through a number of stages in connection with their dealings with the occupation authorities. Some of the gentlemen whose names you have mentioned recently are at liberty, still developing many materials which are of utility to the occupational authorities and in many cases have a great utility to the German government or the German economy and to people who are now administering the German economy. And some of them passed through the stage of withholding information until they found out what the interrogators had and then later on some of them made a different decision, some of them did not; and naturally, that makes a great deal of difference with respect to the total view which the Allied authorities must take concerning them because it is the best way of clearing this facade. I don't think you are making any pretenses as that I should make any pretenses than this situation is not of your choosing --

A. Not of our choosing, no.

Q. No, of course, not. This was a war and Germany lost the war and now there is an occupation. I don't ever want you to say to me that you like that situation or that you don't wish it had gone another way because I would know you were falsifying. But we are terribly concerned as to whether or not your loyalties still remain such that it affects your ability to tell the truth. We are also terribly concerned with whether or not the period of pretense had a bad

effect on you -- these 12 years of a police state when a lot of people made a lot of pretenses to one another - Nazi between Nazi, non-Nazi to Nazi, non-Nazi even to non-Nazi -- because no one knew exactly where the other person stood in his deepest heart. I am certain you even felt that with respect to some of your IG Farben Vorstand members, is that correct?

A. That is correct.

Q. And certainly some of them rather emphatically had views concerning other Vorstand members including yourself. Now some of them are in a position now to fortify their views because they have cooperated so completely, at least with respect to telling the detailed truth, that they can be trusted to go over some of these files, and by the time we have made the determination that they can be so trusted, we usually find that they find that they find in these files things which substantiate fairly well some of the things they have said. I mention that only that it indicates that by the time we are certain in our mind, or relatively certain in our mind, concerning the ability to tell the truth -- and in some cases it isn't a question entirely of intent, it's a question of the ability of the man to discard these pretensions he has built around his innermost heart.

A. I understand you.

.....

Testimony of Georg von SCHNITZLER
taken in Muenster, Germany, from 1400 to
1745, 20 February 1947, by J. A.
SPEER. Also present: Hans J. VOLFFSCH;
later, Dr. Albert L. W. L. H. ST. P. S. M., Court
Reporter.

BY MR. S. RACHNER:

.....

Page 38:

Q. Is there any other error?

A. Yes.

Q. Now, you have stated "yes"; what do you mean by yes?

A. (No answer)

Q. Mr. von SCHNITZLER, you are taking some time. You
have read both the statements; is there anything false therein?

A. Well, when I made them I was of the strong belief
these things had happened, but I think I was under the wrong
impression. The facts had been like that, but I am presently
at a loss --

Q. Now, Dr. von SCHNITZLER, you are talking again in
very general terms, which as I have said before has led people
to make certain statements about you. You stated now that
in August 1946 when you wrote these facts down and they appeared
to you to be true at that time. Now, just point out any one fact
where you state that which is not true instead of saying these
general things in very broad terms. You see it just confuses your
attempting to be ambiguous and vague.

A. I have forgotten; I really have forgotten.

Q. You see, Dr. von SCHMITZLER, you were talking facts; you were talking about things that happened, and I think you were honest enough at that time to have stated certain clear facts, for which I will show you certain corroboration at the proper time. Now, I want to know why these plain and simple facts as stated by you no longer seem to you to be facts, and you are at a loss of words, you are at a loss for words; that is the first time I have ever heard you were at a loss for words.

A. No, that is not the impression; that is not my impression now.

Q. I have asked you for the last fifteen or twenty minutes to point out something that is erroneous; something that is false; something that is wrong; and you just say I am at a loss for words; I forget. Does your conscience bother you about this? Does your conscience bother you about this?

A. Yes, but not because of not telling the truth, but I had an entirely wrong picture before.

Q. You are talking about a picture; now, let's talk about facts. Point out a fact that you stated there which is a falsehood, which is not true; Point out a fact - there are one, two, three, four, five, six paragraphs on the one page, one short paragraph on the other page; your signature appears below; and when I ask you to point out what is false, you say I had a false impression and then you stop.

A. Give me a certain time to think it over.

Q. I beg your pardon?

A. Give me a certain time to think it over; I am shocked.

Q. I imagine you must be under something of a shock because I have confronted you with the written record to which you subscribed, after you have given your oath. You stated you never intended to tell falsehoods; and now I have shown you the record and you don't point out any falsehoods, but you say you had a false picture; and you are not able to substantiate any specific matter during the last half hour by any specific point wherein lies the falsehood. You must have a great amount of worry about these two documents, Mr. von SCHWITZER.

A. Yes, I have.

Q. Do you feel that these two documents incriminate you?

A. Yes.

Q. How?

A. (No answer)

Q. How do you think they incriminate you? You give me no answer.

A. Must he write every word? Can't he stop for a moment?

Q. Dr. von SCHWITZER, you should have no fear of the record; I have been trying to give you every opportunity to have everything clear in the record. It wasn't necessary for me to show you a lot of these documents. I could have taken some testimony from other people without ever having considered you because some of it is quite overwhelming about some of the points, and I chose to give you a chance to be very direct

with me concerning this record, and I have repeatedly asked you to be direct with me, as I tried to be direct with you. Is that correct?

A. Yes.

Q. And now you want something to be off the record with me. I don't see why you don't want to speak clearly to me on the record, so if you have something on your heart, we will have it on the record rather than have it just between you and me. Go ahead and speak now, if you have said what you have said and if you are willing to face the truth.

A. Yes, I have to face the truth.

Q. Then you will agree, I think, when I read the statement to you that the truth remains to be the best policy.

A. Yes.

Q. Now, the truth remains to be the best policy and you are going to speak; what are you going to say?

A. That I fear -- I wished to be cooperative and say the full truth that I considered more things than really happened; that is the way I feel.

Q. The association of events in your mind during the dissolutionment which you had after the collapse of Germany caused you to associate certain things in your mind at that time when you were asked to state your recollection of the facts and your conclusions about the facts.

A. Yes.

Q. And on the basis of that you made these statements.

A. I made these statements.

Q. And now you feel there is something about these statements that incriminates you; is that right?

A. (No answer)

Q. That involves you?

A. It incriminates me if there is something wrong in these statements, you know.

Q. Now, just what is wrong. Take the first paragraph. You have pointed out that the mobilization order didn't come out until the beginning of the war.

A. Yes.

Q. And this statement was wrong; I can understand that that is the type of thing about which you could have made an error; that you know there were such mobilization orders for many years is very plain. You have said that in connection with documents, and the documents are full of these orders.

A. I have one myself, mobilized for the 18 Farben.

Q. Of course. At the time incidents began to happen in the summer of 1938 you were a very worried man.

A. Yes.

Q. Weren't you?

A. Yes, I was.

.....

page 59

A. It was clearly written in my recollection at that time, yes; so I would say it now, but it was my impression --

Q. But it was your impression. I am quite disturbed by

some of the problems which had been raised before I began this interrogation by other people. I think that we can better go over until morning so that you can collect yourself again, Dr. von SCHMITZLER. You seem to me rather shaky; is that correct? Isn't that right?

A. Yes, I am shaky.

Q. Now, will you try to think about the truth over night. I make that a special request to you because I have a very serious responsibility in connection with this; I made that plain to you the first day; isn't that right?

A. Yes.

Q. I just want to be sure, and I want to discharge that responsibility to the best of my ability, and I would like to think I could do so on the basis of complete and utter frankness; and with a man who shows courage as well as truthfulness. All right, that will be all.

A. Yes.

(1745, 20 February 1947)

DOCUMENT BOOK XIII SCHWITZLER
SCHWITZLER DOCUMENT No. 323
Exhibit No.

Interrogation of Georg van SOESTER
by Daniel A. Srecher, 22 February 1967
10:20 - 12:10 hours, Room 166, Palace of
Justice, Muenberg, Germany
Also present: H.J. Wolffsch
Lotte Kluge, Court Reporter

Page 10

Q: Now, Doctor, what is now upon your conscience concerning this matter?

A: I have written this morning something to give you an idea.

Q: Now I understand, you have written another statement and you feel that you can state your additional remarks more cogently if you read this statement.

A: (The interrogator reads:)

" The last 2 paragraphs were added after a long discussion with Mr. Weissbrod. I originally did not want to insert it as they seemed to me unacceptable. Mr. Weissbrod induced me to do it and at last I subscribed to them understanding them in the following sense: You reverted at the beginning of your interrogations to the fact that I am a religious man of deep-rooted faith and conviction in Jesus Christ. Consequently I accepted the responsibility in the Christian sense as Bishop Wurm of Evangelische Lutherkirche had later on determined it in a much more eloquent way than I am able to do it. By this, I mean that I share the responsibility with the entire German people which has participated in that terrible tragedy of the years 1933-1945, but no special responsibility is meant with my wording in the

- 17 -

legal sense."

Q: Let me see if I understand what you mean by a series of questions. When I get your answer to the first questions, then I will be better able to ask the last questions. On the one hand you mean to say - following the determination of Bishop Wurm - that anyone who made a contribution during the Hitler era is responsible in some degree for the tragedy of this era.

A: That's right.

Q: On the other hand, you do not feel that you are responsible in a legal sense for your contribution?

A: That is, what I mean.

Q: You do not mean to deny that you or I.G. contracted a great responsibility in connection with the entire policy of the Hitler era from 1933 to 1945?

A: No, I don't deny it.

Q: And if I understood you correctly, you recognize that by your acts and the acts of I.G. Farben you and I.G. Farben have contracted a great responsibility in that your acts and the acts of I.G. Farben constituted a substantial help to Hitler's foreign policy?

A: That is the responsibility before God, that is what I meant.

Q: But not in a legal sense?

A: No, not in a legal sense.

Q: It is interesting to get your opinion in the matter for

me as a lawyer, that you feel an additional responsibility before God.

A. It was an underlying motive.

Q. Now one further point. You have not mentioned it. It is a point in addition. You recognize a responsibility before God, and you do not recognize a responsibility before the law?

A. Yes, that is, what I mean.

Q. Do you recognize a responsibility before mankind in the same sense that you recognize a responsibility before God?

A. That is the consequence of the responsibility I take before God. I, of course, followed the laws of our country. To the best of my conviction, we never did something unlawful against humanity as far as we were concerned. But having been in this terrible boat, and having participated in the handling of this boat, we have that responsibility before God.

Q. And in consequence before mankind?

A. Not directly, but indirectly.

Q. I can understand very clearly the distinction between your responsibility before God and before the mankind on the one side, and before the law on the other side, but I do not quite get the line which you draw with regard to your responsibility before God and before mankind.

A. May I answer you with the Mattheus Evangelium.
There are two duties for a Christian: the love of God and the
love for your neighbor. Consequently, in answering your
question about mankind, we acted against the love ^{of} our neighbors,
and that is what I meant when saying "consequently".

Q. Mr. von SCHNITZLER, you have tears in your eyes, do
you wish me to discontinue this interrogation?

A. No, I thank you.

.....

Affidavit.

I, Dr. Gustav KUEPPER, Attorney and notary public in Frankfurt/Main, Gretschelstr. 16, after having been informed that I render myself liable to punishment by making a false statement, and that my statements are to be submitted as evidence to the Military Tribunal VI in Nuernberg, hereby declare the following on oath, of my own free will and without coercion:

My statement of 30 August 1947 with regard to my experiences and adventures during the interrogations by the so-called Bernstein-Commission in Frankfurt/Main in 1945, is true to the best of my knowledge and belief.

Frankfurt/Main, 15 May 1948

Signed: Gustav KUEPPER

Dr. Gustav KUEPPER

I hereby certify and attest that the above is the personal signature of the afore-mentioned Dr. Gustav KUEPPER.

Frankfurt/Main, 15 May 1948.

Signed: Helmut HENZE
(Helmut HENZE)
Attorney

Frankfurt, 30 August 1947

At the request of the defence for the defendants in the I.G. trial in Nuernberg, I, the undersigned Dr. Gustav KUEPPER, attorney in Frankfurt/Main, Cretaschstr. 16, make the following statement with regard to my experiences and adventures during the interrogations by the so-called Bernstein Commission in Frankfurt/Main in 1945.

I must state to begin with that I was titular director of the IG Farbenindustrie Aktiengesellschaft in Frankfurt/M., Gruenburgplatz, up to the end of the war. In 1923 I joined the Chemische Fabriken, formerly Jellertor Maar in Vordringen (Lower Rhine), one of the legal predecessors of the IG Farbenindustrie AG, as a lawyer. From 1930 onwards I was a jurist in the legal department Farben in Frankfurt/Main, and chief of this department from about the end of 1938. At the same time I was chief of the central insurance department and manager of Farben G.m.b.H. Konzern Insurance.

On 1 May 1945 I was summoned to the Reichsbank building in Frankfurt/Main, Taunusanlage, for questioning by an American Investigation Commission. The investigator was an American in civilian uniform by the name of Sechs. One of the first questions was: what connections I had had with high Nazi functionaries.

After I had stated truthfully that I had had no very close relations of this kind I was loudly and angrily addressed with the remark that I would have to expect severe measures. I truthfully answered a question as to all depots for I.G. files which were known to me, and the files stored by the legal department of Farben in a convent at Miltenberg, were collected on the same day and taken to Frankfurt/Main in a jeep by Mr. Sachs, some attendants, one of the former employees of my department, Fraulein Ingrid Mueller and myself. After a previous examination of Fraulein Ingrid Mueller, I was asked about the whereabouts of the so-called "Camouflage-data". When I replied that as far as I knew all this data was there, Mr. Sachs and a second American in Civilian Uniform shouted at me in the presence of an American officer that I had told a lie. When I insisted that I had told the truth I was repeatedly threatened with arrest. When I repeated my assertion nevertheless, Mr. Sachs asked the other American in Civilian Uniform: "What shall we do with that fellow?" The answer was: "Lock him up". I was then taken to the former Guttenkaserne at Frankfurt/Main and shown to a room without windows and without doors that could be closed, which reeked with rubbish and dirt, and had only plank-beds and no blankets. In spite of the season it was unusually cold.

and there was no question of sleeping. There was neither warm food nor hot drinks. When I asked the guard next day to be allowed to wash, this was refused with the remark that this was no hotel. Fraulein Mueller had also been arrested and was in another room of the Gutleuthauserne. A few days later at about 9 o'clock in the evening I was again taken to the Reichsbank building for an examination by the above-mentioned Americans. It was mainly Mr. Sachs who directed the examination. After repeated inquiries about the above-mentioned data and my assertion that they were all among the files brought from Mittenberg, I was shouted at several times and threatened. Among other things I was threatened with being handed over to a Russian liaison officer who would apply to me the well-known Russian methods of investigation; I was also threatened with evacuation to Siberia, with the hint that with my experience in the establishment of new factory-plants the Russians would find me useful. When this had no effect, Mr. Sachs said: "Think of your poor wife and your poor children, and what might happen to them if you persist on your attitude." Finally Mr. Sachs, produced from the writing-table, a large photograph of my wife, threw it down in front of me and declared: "Perhaps that will change your mind". Mr. Sachs had taken away this photograph in a search of my house, together with a whole number of family-papers. According to my wife's account, who was rudely addressed by Mr. Sachs

and asked "to hand over the files" (which were not there). During this search, Mr. Sachs threw my small son's toys on the floor (miniature toy aeroplanes among other things) and trod on them in the presence of my wife and my son, who was 4 years old at the time and the owner of the toys.

When they had evidently gained the impression that I really had no intention of hiding or concealing anything, the further examinations by Mr. Sachs were less stormy, and after being arrested for 13 days I - and shortly afterwards ^{Frau} Mueller also - was released from the Gutleuthauserne, though I remained confined to the house until about the middle of August. No further mention was made of the allegedly missing "Comouflage-dats".

Dr. von SCHWITZLER was arrested a few days after me and was also taken to the Gutleuthauserne. A short time after my release I was talking to Mr. Sachs in front of the building next to the Reichsbank when Frau von SCHWITZLER passed us and entered the building. She had already reportedly approached Mr. Sachs and other Americans to obtain the release of her husband. Thereupon Mr. Sachs said: "I am sure she would sleep with any American Officer to get her husband out of jail". As I heard later, Frau von SCHWITZLER was arrested by Mr. Sachs immediately afterwards. Mr. Sachs himself told me with a laugh next day: "She" (meaning Frau von SCHWITZLER) "is

in jail now." Some days later he told me, again with a laugh: "Now she is completely out of her senses." I may add that at this time Frau von SCHNITZLER was still in a Frankfurt prison. Frau von SCHNITZLER can report personally on her experiences during her arrest and detention. Some time later - about June 1945 - Mr. Sachs returned to America.

Apart from the special experiences and events described above, all those who were examined at the Trausnitzlager felt very much depressed by the constant danger of arrest and by the fact that one after another a number of directing and other members of I.G. Farben were arrested and detained for a long or short period in the Frankfurt Prison Frauenstein. It was most disappointing to witness the daily transport of a whole number of former members of the I.G. to and from the building in the Trausnitzlager at Frankfurt/Main where all witnesses were examined. I recall in particular that ^{Mr.} Sachs came to me several times after an examination in the Reichsbank building of Prokurist LINGENSIEPEN and stated he would probably arrest Herr LINGENSIEPEN. This actually happened - though Herr LINGENSIEPEN was released again - after a short time. When speaking to me Mr. Sachs also threatened to arrest other colleagues, expressing the hope that I would conduct myself in such a way

that it would not be necessary to re-arrest me.

At the beginning of June another member of the investigation commission, Mr. A. WEISSBRODT, came to Frankfurt. At first he was most affable. He offered me tobacco and discussed with me general political questions dealing with the war and problems of the I.G. About a fortnight after this discussion Mr. WEISSBRODT submitted to me a statement which he had drawn up requesting my signature. Among other things this statement dealt - sometimes with complete misrepresentation or giving a distorted version - with declarations supposed to have been made by me concerning the approval of war measures against Poles and the west, of the entry into the Czechoslovakian Republic and so on by the direction and members of I.G., the advantages of the war for I.G. and so on. My reported attempts to bring about alterations were rejected with the explanation that I had already made an oral statement to this effect, and I was only allowed to make slight changes. I then signed the statement knowing, after my experience with Mr. Sechs, what would otherwise happen to me, but I did not sign until Mr. WEISSBRODT gave me full assurance that no importance would be attached to the statement, that it would be filed and would not be used or published in any way. In spite of this it was published and, as far as I remember, again distorted, several months later in the German Press. This statement was mentioned in an examination

by Attorney Mr. CHARLITZ in November in June of this year. I declared that it was incorrect and had been obtained under the stress of experiences and events of that time and that it would not be repeated by me. To-day an affidavit on the points mentioned would look very different. Mr. CHARLITZ made no further mention to me of the matter.

willin

I am/ta repeat the above statement on oath at any time.

Signed: Dr. Gustav KUEPPER.

DOCUMENT BOOK XIII SCHNITZLER

 CERTIFICATE OF TRANSLATION

2 June 1948

We, the undersigned, hereby certify that we are duly appointed translators for the English and German languages and that the above is a true and correct translation of the Document Book XIII Schnitzler.

pages I - IV 1 - 2	PETER DIESEL ETC No. 30254
" 3 - 7	WILLI REZER ETC No. 25967
" 8 - 11	A.B. DAVEY ETC No. 20115
" 16, 20-22	M.E. WASON ETC No. 8176
" 42 - 51	MUNIC. BILL COE ETC No. 20148

pages 12 - 17, 19, 23 - 31: previous translation used.

" END "

CASE NO. 6 - TRIBUNAL VI

DEFENSE

von Schnitzler

Loose Copies of Documents separately distributed

English



I, Dr. Max Jener, at present at Emsberg in the prison of the Palace of Justice, know that I render myself liable to punishment by executing a false affidavit. I declare in sign of oath that my testimony is a true statement of the facts and that it was given in order to be submitted as evidence to Military Tribunal VI in the Palace of Justice in Emsberg.

I was brought to the prison in Nuernberg in March 1947. After my interrogations in Nuernberg had started on March 25, 1947, I met my colleague Dr. Georg v. Schnitzler in the writing room, to which prisoners confined in Nuernberg are taken, before being conducted to the interrogators, on one of the following days. Schnitzler, who, as I had heard from him, had already endured many interrogations and, on this day, been called to yet another interrogation, made the impression of a completely broken man. He was in a state of abject depression of the same kind I knew he suffered from in 1945, when both of us were housed in the Preunzesheim penitentiary, while we were being at the same time interrogated in the building Thurnauanlage No. 5. It was evident from the brief remarks he made on the occasion of this meeting that, under the impression made on him by the Nuernberg interrogations, v. Schnitzler had again lapsed into a psychosis of self-incrimination. I spontaneously asked myself what kind of pressure Schnitzler could have been subjected to; for there must have been a special reason for his being in a physical and mental state so much worse than he had been in 1945 when I had met him and talked to him. At that time in March/April 1947, Schnitzler was the only one of all Farben 'Direktors' to be housed in Criminal Wing No. 7, in the wing for so-called criminals proper, there at that-



~~Letter for Defendant~~
~~Dr. Schnitzler~~

time persons convicted had been segregated and confined. Owing to this special treatment, Schnitzler had no contact with the other gentlemen of Farben. In view of his poor physical condition and his unbalanced state of mind, I fully realized that the sole fact of his receiving special treatment would confirm him in his psychosis that he had been singled out as a victim.

(Page 2 of original)

His mental and physical condition only improved when, in the summer of 1947, Dr. v. Schnitzler was indicted together with the other Farben gentlemen and, now that his interrogations were finished, was treated in the same manner as the others and hence also had contact with the other gentlemen and with his counsel.

Everybody who gets to know Dr. v. Schnitzler or who, like myself, has known him for a long time, knows that, owing to his weak, unbalanced and pliable cast of mind, he is easily influenced and most susceptible if exposed on the one hand to bad treatment, for instance threats, and on the other hand to temptation by subsequent friendly treatment. I can confirm, moreover, that during his interrogations Dr. v. Schnitzler was emotionally told, as he himself told me, that, according to occupational law, he, like any German national, was obliged to make full statements. I also know that during his interrogations, he was neither cautioned that he was to be indicted nor that he could refuse to testify nor that his affidavit could be used against him.

Muenberg, May 28, 1948

Signature

Dr. Max Jilmer

This is to attest and certify the above signature of Dr. Max Jilmer as executed before me, Dr. Walter Sigmars, barrister, Muenberg, May 28, 1948.

Signature
Dr. Sigmars

CERTIFICATE OF TRANSLATION

I, Siegfried Ramler, ETO 34429, hereby certify that I am a duly appointed translator for the German and English languages and that the above is a true and correct translation of the motion v. Schmitzler.

Munich, 1 June 1948

Siegfried Ramler
ETO 344 29

DEFENSE

CASE 6 - TRIBUNAL VI

<u>v. Schnitzler</u> <u>Exhibit No.</u>	<u>v. Schnitzler</u> <u>Document No.</u>	<u>DESCRIPTION</u>
225	227	Affidavit by Lilly v. Schnitzler dtd. 26 May 1948
226	228	Excerpts from interrogation of Friedrich Gaus on 6 March 1947
227	229	Excerpts from transcript of Case 11 on 3 March 1948
228	230	Affidavit by Werner von Hoven dtd. 17 March 1948

never distributed



NATIONAL ARCHIVES MICROFILM PUBLICATIONS

Roll 94

Target 2

Wurster

1-Disposition of the Document Books

NATIONAL ARCHIVES MICROFILM PUBLICATIONS

Case 6
Defense

TRIBUNAL VI

CASE VI

DOCUMENT BOOK No. I

for

Dr. Carl WURSTER

presented by
the Defense Counsels

Friedrich Wilhelm WAGNER
Attorney-at-Law

Dr. Wolfgang HEINTZELER
Attorney-at-Law

Lang



Index to Document Book I

Dr. Carl WURSTER, Case VI

Doc.No.	Exh.No.	Contents	Page
305		Documents concerning Dr. Wurster's career. Affidavit by Dr. Carl Wurster dated 8 January 1948, containing his curriculum vitae before he joined the Vorstand of IG on 1 January 1938	1-4
175		Affidavit by Dr. Max Scharff dated 21 Oct 1947. The deponent was Dr. Wurster's superior in the Ludwigshafen plant until 1932. He states that Dr. Wurster's rapid rise was due entirely to his efficiency.	5-6
180		Affidavit by Dr. Otto Seidel dated 2 Jan 1948. Until 31 December 1937 the witness was a member of the Vorstand of IG and manager of the Ludwigshafen plant. He describes how Dr. Wurster worked his way up by his own efforts without protection or any other influence. Prior to 1 January 1938 Dr. Wurster was not in a position to assess the situation in the Ludwigshafen plant as a whole, leave alone the situation of the IG as a whole, nor was he in a position to know what was the policy of the IG, if one can call it such. He was appointed a member of the Vorstand by Dr. Carl Bosch because of his scientific and technical qualifications, and because of his character. There was no political influence of any kind. The witness concludes as follows: "I know that Carl Bosch whose death in 1940 was undoubtedly hastened by despair caused by political developments in Germany since 1933 considered Dr. Wurster as one of his spiritual heirs."	7-10
562		Speech made by Dr. Carl Wurster on the occasion of the funeral ceremony for Carl Bosch 1940. (Excerpt from the IG factory paper). "..... Let us continue along the road he (Bosch) has shown to us, let us be untiring seekers after truth, champions of scientific research, champions of technical mastery of the laws of nature, i.e. champions of our beloved Germany and of the progress of humanity."	11-12

Index to Document Book I

Dr. Carl WURSTER, Case VI

Doc.No.	Exh.No.	Contents	Page
188		Affidavit by Eugen Fournier and Eugen Hartlaub dated 20 October 1947. The witnesses are employed in the research laboratory of the Ludwigshafen plant. They have known Dr. Wurster ever since he was a "student worker" there. They describe Dr. Wurster as a man of an entirely new stamp, who saw in every employee of the plant a fellow worker, who disregarded class distinctions and who considered only the good of the whole.	13-15
287		Affidavit by Wilhelm Scherer dated 9 March 1948, containing a list of the German and foreign patents granted for Dr. Wurster's inventions.	16-17
275		Affidavit by Robert Storch and Hans Morgenstaler dated 1 March 1948, stating Dr. Wurster's net income from 1938-1944. After 1938 Dr. Wurster never earned more than he did in that year.	18-19
265		Prosecution exhibit 392, Doc.No. HI-10156. Affidavit by Dr. Ernst August Struss dated 26 August 1947, describing Dr. Wurster's sphere of responsibility at Ludwigshafen and Oppau with effect from 1 January 1938. Dr. Wurster was not responsible for any other plants apart from Ludwigshafen and Oppau, neither in a technical capacity nor as Betriebsfuehrer.	20-21
1		Plan of Ludwigshafen-Oppau plant as on 1 January 1944. Scale 1:5000.	22
286		Affidavit by Karl Reisch and Dr. Fritz Mueller dated 3 March 1948, identifying the plan of the factory, Doc. Wurster No. 1	23-24
3		Organizational chart of the Ludwigshafen plant and affidavit by Dr. v. Nagel dated 29 January 1948.	25
2		Chart showing number and composition of staff of Ludwigshafen-Oppau plant 1938-1945 and affidavit by Otto Weidenbach dated 16 March 1948	26
304		Affidavit by Dr. Carl Wurster dated 17 December 1947 on his work as Betriebsfuehrer of the Ludwigshafen Oppau plant, as a member of the Vorstand and of the Technical Committee	27-39

Index to Document Book I

Dr. Carl WURSTER, Case VI

Doc. No.	Edn. No.	C o n t e n t s	Page
304		of the I.G. subsequent to 1 January 1938. Dr. Wurster explains how he carried out the numerous tasks by which he was overwhelmed after 1 January 1938 and how he himself classified the new duties which devolved upon him after 1 January 1938.	27-39
306		Affidavit by Dr. Carl Wurster dated 8 January 1948 on his work as chairman of the Sulphur subcommittee (after 1934), as member of the inorganic products committee and as member of the chemicals committee (after 1938) of the I.G.	40-42
225		Affidavit by Hans Morgenthau dated 26 January 1948. The witness was Dr. Wurster's private secretary from 1933 onward. He describes in detail the manner in which Dr. Wurster fulfilled his numerous duties from 1938 onward, he also describes Dr. Wurster's daily timetable; Dr. Wurster's working hours exceeded the normal working period by far owing to his unusual conscientiousness. He describes the volume of mail which reached Dr. Wurster daily and which it would have been physically impossible to peruse. The witness states that during the war Dr. Wurster concentrated all his energies even more than before on the Ludwigshafen-Oppau plant on account of the air raids.	43-48
168		Affidavit by Professor Dr. Erich Pietsch on Dr. Wurster's work in his capacity of chairman of the "Adolf Bayer Society for the promotion of chemical literature". After the death of Carl Bosch Dr. Wurster became his successor as chairman of this society in 1940. It was a purely honorary scientific function.	49-51
594		Excerpt from Document Schrift No. 41, Vol. III. Affidavit by Professor Dr. Adolf Andrus and Professor Dr. Otto Kahn dated 20 March 1948, containing an appreciation of Dr. Wurster's work as successor of Carl Bosch in the Adolf Bayer Society.	52-53

Index to Document Book I

Dr. Carl WURSTER Case VI

Doc. No.	Exh. No.	Contents	Page
255		Affidavit by Dr. Ernst Kuss, member of the Vorstand of Duisburger Kupferhütte, dated 6 February 1948. The witness describes Dr. Wurster's activity as member of the Aufsichtsrat of the Duisburger Kupferhütte from 1939 onward.	51-56
246	*/1948	Affidavit by Dr. Botho Milert dated 16 January 1948. The witness described Dr. Wurster's activity as a member of the Aufsichtsrat of the Saackelbische Holzwaren- und Zuckerraffinerie A.G. from 1940 or 1941 onward.	57-60
133		Affidavit by Dr. Ernst Kuss, member of the Vorstand of the Ludwigshafener Walzwerke A.G. dated 2 January 1948. The witness described Dr. Wurster's activity as President of the Chamber of Industry and Commerce in the Palatinate from 1941 onward. He describes the attempts which were made after the collapse in 1945 to secure the services of Dr. Wurster for the advisory committee of the newly established Chamber of Industry and Commerce, in view of his politically unexceptionable conduct during the second world war.	61-64
223		Affidavit by the Vorstand of the "Palatinate District Association of the Chemical Industry" dated 29 January 1948. The affidavit states that Dr. Wurster continued after the collapse to enjoy the confidence of the chemical industry in the Palatinate and that he was reelected representative (Obmann) of the Professional Association Chemical Industry (Palatinate) because of the objective and politically unexceptionally manner in which he carried out his duties as chairman of the district association Saar-Palatinate, Economic Group Chemical Industry, during the war.	65-66
186		Affidavit by Dr. Hugo Storch dated 2 January 1948. The witness was local group leader of the Nazi Party in Ludwigshafen. He states that Dr. Wurster was made a Party member in 1938 in accordance with instructions issued by Gauleiter Burckel. "Dr. Wurster is therefore one of the very few Party members of the former local group Ludwigshafen/Rhein-Hausen of the NSDAP whom one can really describe as a 'compulsory Party member' in the true sense of that phrase."	67-69

Index to Document Book I

Dr. Carl WURSTER, Case VI

Doc. No.	Exh. No.	C o n t e n t s	Page
102		Affidavit by Josef Bast dated 27 October 1947. The witness states that immediately before the occupation of Ludwigshafen by the Americans Dr. Wurster was repeatedly asked by cable from Berlin, to leave Ludwigshafen immediately and to report to Berlin. Dr. Wurster disregarded that request in the interests of the plant.	70-71
549	*/military	(Speer Exhibit No.25 in the IMT trials). Hitler's demolition order dated 19 March 1945. "All traffic, information, industrial, and supply installations and equipment within the Reich..... will be destroyed.Instructions to the contrary are invalid."	72
550		(Speer Exhibit No.28 in the IMT trials). Hitler's implementary decree dated 30 March 1945 in moderation of the demolition decree dated 19 March 1945. ".....the same purpose can be served by thorough crippling of industrial plant and supply installations. Total demolition of exceptionally important factories will be arranged on my orders by the Reich Minister for Armament and War Production (e.g. munitions factories, the most important chemical plants, etc.)."	73-74
11		Proclamation by the plant management of the Ludwigshafen plant (Dr. Wurster) and by the works council (Lorenz) to the staff of the Ludwigshafen and Oppau plants dated 30 May 1945. "Immediately before the collapse the National Socialist government was still demanding that the plant be completely demolished; official propaganda proclaimed that the end of this dreadful war would involve all in chaos and destruction. Let us show at this moment that that must not be allowed to happen; let us use all our knowledge and all our ability, our strength and our determination, to rebuild by the sweat of our brows for ourselves and for our families the foundations of life. The more we can rely upon one another, the easier it will be. Together let us tackle the task."	75-77

Index to Document Book I

Dr. Carl WURSTER, Case VI

Doc.No.	Exh.No.	Contents	Page
174		Affidavit by Lt.Col.Wayland Rhoads dated 16 February 1948. The witness states that Dr. Wurster did all he could when Ludwigshafen had been occupied, to create, out of chaos, a new order. " By manufacturing thousands of tons of fertilizer he caused the production of hundreds of thousands of tons of additional food. This was so very important in both the American and French Zones."	78
138		Affidavit by Captain John T. Marshall dated 12 October 1947. The witness states that he did not in any way consider Dr. Wurster as a Nazi and that Dr. Wurster was largely responsible for restoring law and order after the collapse. " I had close daily contact with all of these gentlemen particularly with Drs.Wurster and and I know them to be honest and honorable gentlemen upon whose word I could depend." When leaving Ludwigshafen on 10 July 1945 the witness regretted that he could not continue to work with Dr. Wurster.	79 - 83
197		Affidavit by Dr. Bernhard Ties dated 9 January 1948. The witness states that on 5 July 1945 when General Order No. 2 was presented by American officers Dr. Wurster was provisionally reinstated as official manager of the Ludwigshafen-Oppea plant.	84 - 89
506		Petition submitted by the works council of the Ludwigshafen plant of the Badische Anilin und Soda Fabrik to the French administration of the plant dated 29 May 1947; " It is the unanimous wish of the staff that Dr. Wurster should come back to us."	90 - 91
507		Proclamation by the French Administration of the Ludwigshafen plant to the employees of the plant dated 21 August 1947 on the occasion of the strike to protest against Dr.Wurster's removal to Nuremberg.	92

This is to certify that the documents contained
in the above document book are correct and
accurate copies of the originals.

Friedrich Wilhelm Wagner

Attorney at Law

Document Wurster

Doc. No. W 305

Exh. No.

Copy.

Affidavit.

I, the undersigned, Dr. Carl Wurster, born on 2 December 1900 in Stuttgart, living in Ludwigshafen a.Rh., Weehlerstr. 16a, at present in the prison of the Military Tribunal in Nuernberg, have been duly warned that I shall render myself liable to punishment by making a false statement. I declare on oath that my statement is true and that it was made in order to be submitted as evidence to Military Tribunal No. 6 in the Palace of Justice, Nuernberg, Germany.

I was born, as already stated, on Advent Sunday, 2 December 1900 in Stuttgart/Wuerttemberg as the fifth of six children. My mother comes of a family the majority of whose members for generations back mainly have been civil servants, doctors and the like. My father comes of a farming family of old Wuerttemberg, which can be traced back as far as the 15th century, because these ancestors were mostly farmers and at the same time village mayors. My father was a lawyer and a civil servant and died in 1941; my mother has lived, since the loss of her home through aerial warfare, with her sisters.

In the home of my parents I learned a modest way of living which was combined with a harmonious atmosphere of which the mainstay was home and family life. From 1906 to 1918 I attended the Grammar School and finished with the school leaving-examination. My special love of the Greek and Latin languages and the enjoyment of classical literature in the original which was made possible thereby, together with music (I began to play when I was 6 years old), remained my chief preoccupations, next to my professional work. From 1 July to 31 December 1918 I was a soldier. My desire to devote myself to the study ^{of} medicine, could unfortunately not be fulfilled, since financial circumstances did not

Document Wurster

Doc. No. W 305

Exh. No.

-2-

make it possible for me, as the youngest one, to study away from my parents' place of residence. It was in this way that I came to study chemistry at the Technical College at Stuttgart, devoting to this work the years from 1919 until 1922. During the period of my studies I was Head of the Cultural Department of the student organization "Student's Representative Council" (ASTA), which was primarily concerned with the purchase of books and teaching equipment and the organization of visits, lectures, theatre shows and concerts for the poorer students. In December 1921 I passed the examinations to become a Qualified-Ingenieur and in 1923 I became a Dr. Ing. (Chemistry), ^{passing} both examinations with "summa cum laude". After passing the diploma examinations, I became an assistant at the Institute of Inorganic Chemistry of the Technical College, working at first as a supernumerary assistant and, from the fall 1922 until the end of 1923 as a member of the permanent staff. In addition to my teaching, I also carried out several independent scientific investigations in the field of inorganic chemistry at that time. As a result of the devaluation of money through inflation, I had to earn most of the money to finance my studies myself. I gave private lessons some to high school students in Greek and Latin, and later to students of Chemistry. Later on I was also a freelance correspondent of the Chemisches Zentralblatt. During the vacations I applied to industrial companies for jobs as a student-worker. Among the favorable replies which I received to applications to various companies, was one from the Badische Anilin und Sodafabrik in Ludwigshafen a. Rh. I worked in the laboratory there for several months during each of my vacations in 1919, 1920 and 1921. Not only did I earn the money to pay the cost of my education, but I also gained valuable professional experience. In addition to this, I profited greatly at that time from direct daily contact with the workers; many of the laboratory assistants and foremen with whom I worked as assistant, are still my friends.

-2-

Document Wurster

Doc. No. W 306

Exh. No.

-3-

On 2 January 1924 I entered the services of the Badische Anilin & Soda-Fabrik in Ludwigshafen a.Rh. as a chemist, on the recommendation of my teachers and there I worked until the middle of 1924 in the so-called main laboratory. In the middle of 1924, I was transferred to the "Inorganics Department" (known at that time as the "Acids Department") where I worked on several problems in the Acids Laboratory. I succeeded in developing new manufacturing processes and improving old ones; from 1925 onwards, this work resulted in a number of patentable inventions and manufacturing processes which were later introduced into the plant. There was, in particular, a new process for the production of anhydrous metal chlorides, which were used for the most varied of purposes; most of these processes are used even today. I continued to work on these problems until the end of 1931, part of the time as a research chemist and part of the time as Production Manager. At the end of 1931, I received the order to prepare to take over the management of the Inorganics Department (approximately 800 hands); I worked there as Deputy Department Chief throughout 1932 and 1933 and I took over the sole management of the Department in 1934. In connection with this post, I received *per procura* powers on 4 April 1934 and, in the position, which I held until the end of 1937, received the title of director on 6 June 1936. In addition to the normal duties falling to the lot of a Department Chief, my work in Ludwigshafen during those years consisted mainly in the improvement of existing production processes and the introduction in the field of new ones of inorganic Chemistry. There was also a research laboratory for inorganic Chemistry attached to the Production Department. From 1 January 1938 onwards, following the retirement of two members of the Vorstand who had reached the retirement age, I was appointed Betriebs-fuehrer of the Ludwigshafen-Oppau Works in accordance with the law

-3-

Document Wurster

Doc. No. W 305

Exh. No.

-4-

for the Regulation of National Labor which was valid at the time. I continued to be responsible for the management of the inorganic plants at Ludwigshafen, although my successor as Chief of the Inorganic Department was given a large measure of independence and for the rest, I shared responsibility for the management of the works with Dr. Ambros and Dr. Mueller-Gunradl, on equal terms until 1945.

On 24 July 1926 I married Margareta, née Bergman, a Swedish citizen, and was wedded to her in accordance with the laws of the Swedish Protestant State Church. We have two children, Birgitta, born on 17 February 1929 and Monika, born on 8 October 1933, who were also baptised into the Protestant faith. My daughter Birgitta received her first communion in public from a preacher of the Confessional Church, who is intimately connected with us.

Munich, 8 January 1948

signed: Dr. Carl Wurster

I, Friedrich Wilhelm Wagner, Attorney-at-Law, at the present in the Palace of Justice, Munich, herewith witness and certify the above signature of Dr. Carl Wurster which was appended in my presence.

Munich, 8 January 1948.

signed: F. W. Wagner

Attorney-at-Law

-4-

Document Wurster

Doc. No. 175

Exn. No.

Affidavit

I, the undersigned Dr. Max Scharff, born on 4 November 1871 in Chemnitz, living in Heidelberg, Weberstr. 3 have been duly warned that I shall make myself liable to punishment by making a false statement. I declare on oath that my statement is true and that it was made in order to be submitted as evidence to American Military Tribunal No. 6 in the Palace of Justice, Nurnberg.

I entered the services of the Badische Anilin & Soda Fabrik in Ludwigshafen a.Rh. as a chemist in 1896. Until 1933 when I retired, I was employed as follows: as a chemist until 1913, and from then onwards as Department Manager of the Inorganics Department, which was then called Acids and Soda Department. From 1919 onwards, I was Deputy Director of the Badische Anilin and Soda Fabrik, and from 1925 on, of the I.G. Farbenindustrie Aktiengesellschaft as it then became.

Dr. Carl Wurster was employed in my department from the time of his joining our company. Consequently I had the opportunity to observe Dr. Wurster very carefully and to get acquainted with him. Dr. Wurster was an extraordinarily industrious, conscientious and reliable chemist, whom I could trust implicitly. That he succeeded at a comparatively young age in obtaining a leading position in the Badische Anilin & Soda Fabrik, later I.G. Farbenindustrie Aktiengesellschaft,

Document Wurster

Doc. No. 175

Exh. No.

-2-

was due purely to his own personal efficiency and to his other excellent qualities and cannot be traced back to any factors not connected with his professional activity. I have come to know Dr. Carl Wurster as a consistently sincere and honest person and I hold him in extraordinarily high esteem on account of his valuable qualities.

Ludwigshafen a.Rh., 21 October 1947

signed: Dr. Max Scharff

I, Friedrich Wilhelm Wagner, Attorney-at-Law of Ludwigshafen a.Rh., herewith witness and certify the above signature of Dr. Max Scharff, which was appended in my presence.

Ludwigshafen a.Rh., 21 October 1947

signed: F.W. Wagner,
Attorney-at-Law

-5-

Document Wurster

Doc. No. W 180

Exh. No.

Affidavit

I, the undersigned Dr. Otto Seidel, residing in Heidelberg, Schloss-Wolfsbrunnengasse 5, have been duly warned that I shall render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is true and was made in order to be produced in evidence for Case 6 before the Military Tribunal at the Palace of Justice in Nuremberg, Germany.

1) In 1901 I entered the employ of the then Badische Anilin- & Soda-fabrik in Ludwigshafen on Rhine as a chemist and in 1918 was appointed a member of the Vorstand of this company. When in 1926 the I.G. was founded, I was taken over into their Vorstand; and afterwards I continued to be in charge of the technical management of the Ludwigshafen Works. Having reached the age limit, I retired on 31 December 1937. At no time was I a member of the NSDAP or of any of its affiliated organizations.

2) Herr Dr. Carl Wurster entered the employ of the then Badische Anilin- & Soda-Fabrik Ludwigshafen on Rhine as laboratory chemist on 2 January 1924 and I have known him personally since that time. In view of the fact that he was appointed member of the I.G. Vorstand and Betriebs-fuehrer of the Ludwigshafen-Opau Works at the time when I retired from office, I am unable to make any statements from my own personal knowledge as to his work as member of the I.G. Vorstand and Betriebs-fuehrer of Ludwigshafen-Opau, upon which he embarked on 1 January 1938.

Document Wurster

Doc. No. W 180

Exh. No.

-2-

However, I am acquainted with all the details of his career in the Ludwigshafen Works up to 1 January 1938.

3) Dr. Wurster attracted the attention of the Ludwigshafen management at an early stage, primarily by his achievements in work both of a scientific and technical nature. Even in the first years of his employment with the factory he succeeded in inventing new production processes and improving old ones. His efforts produced several patentable inventions which were later adopted by the plant. Above all, I should like to mention a new process for the production of anhydrous metal chlorides which were used for a very wide range of purposes. Dr. Wurster was occupied with this work up to the end of 1931, partly in his capacity as laboratory chemist, partly in his capacity as Betriebsleiter of various production branches. Apart from his outstanding technical qualities, Dr. Wurster soon showed himself to be a person of great energy and great skill in the handling of people. He was of excellent character and had high ethical standards and a pronounced gift for organization. Consequently, at the end of 1931, he was ordered to familiarize himself with the duties of the manager of the Inorganics Department of the Ludwigshafen plant. In 1932 and 1933 he deputized for the manager of this department and he resumed charge of the department in 1934. He continued to hold this position until 1 January 1938, at which time he joined the Vorstand; in addition, he was appointed Prokurist in April 1934; in 1936 he received the title of Director.

In view of the fact that Ludwigshafen was the classical center of modern sulphuric acid production, based on the so-called catalytic process - the first sulphuric acid catalytic plants

-8-

Document Wurster

Doc. No. W 180

Exh. No.

-3-

of the other I.G. works were only established after licenses had been received from Ludwigshafen - Dr. Wurster was also made the manager of the I.G. Sub-Committee for Sulphuric Acid and Kindred Products (so-called "Sulphur-Sub-Committee") in 1934, in addition to his position as manager of the Inorganics Department. The work of this Sub-Committee consisted in coordinating the production interests of the various I.G. works within the above-mentioned sphere of work.

- 4) Although the Ludwigshafen management recognized Dr. Wurster at an early date as an outstanding representative of the younger generation, he remained, throughout the period of time I had the opportunity to observe his career (up to 1 January 1938) purely an expert in the field of inorganics production in Ludwigshafen and, within the I.G. as a whole, an expert in the field of sulphuric acid and kindred products. His work in Ludwigshafen consisted in fulfilling the normal duties of a department chief, i.e. in the improvement of old production processes and in the adoption of new ones as well as in the supervision of the inorganics research laboratory which was attached to his department. Up to 1 January 1938, he had no influence whatsoever ^{on} and no inside knowledge of the general conditions in the Ludwigshafen Works, let alone those of the I.G. Farbenindustrie Aktiengesellschaft. In particular, up to 1 January 1938, he had no inside knowledge either of the technical fields outside his own sphere of work, or of the financial and commercial conditions of the I.G. as a whole, or even of the broad policy followed by the I.G., if one can speak of such.

-3-

Document Wurster

Doc. No. W 180

Exp. No.

-4-

- 5) The fact that Dr. Wurster was appointed member of the Vorstand of I.G. and Betriebsführer of the Ludwigshafen-Opau Works at the early age of 37, is primarily the work of Dr. Carl Bosch, who at that time was the chairman of the Aufsichtsrat of IG and its spiritual leader. The great personalities in the field of chemistry, amongst them primarily Carl Bosch, influenced the development of the Ludwigshafen-Opau Works from its beginnings. Bosch likewise recognized the high scientific, technical and human qualities of Dr. Wurster at an early date; he therefore supported him and finally, on 1 January 1938, appointed him member of the Vorstand. There is no doubt that the political events after 1933 had no influence whatsoever on the decision of Carl Bosch to appoint Dr. Wurster as member of the Vorstand. In view of Bosch's well-known opposition to National Socialism, pro-Nazi sympathies on Dr. Wurster's part would have been enough reason for Bosch to discontinue his support. I know that up to the time of Carl Bosch's death, which was surely brought about in part by Bosch's despair over Germany's political development since 1933, he continued to regard Dr. Wurster as one of the perpetuators of his spiritual heritage.

Heidelberg, 2 January 1948

signed: Dr. Otto Seidel

The above signature of Herr Dr. Otto Seidel was appended before me, Dr. Wolfgang Heintschler, Ludwigshafen on Rhine, Brunckstr. 13, and is hereby certified and attested by me.

Heidelberg, 2 January 1948

signed: Dr. Wolfgang Heintschler
Attorney-at-Law

Document Warster

Doc. No. W 562

Exh. No.

Excerpt from the "Carl Bosch Supplement" of the May 1940 Issue of the
I.G. FARBEINDUSTRIE AKTIENGESELLSCHAFT Works Gazette

"From Works to Works"

(Address delivered by Dr. Carl Warster, Betriebsführer of the Ludwigshafen on Rhine and Oppau Works on the occasion of the funeral service for Carl Bosch in Ludwigshafen on Rhine).

"This is the last time that we have Carl Bosch in our midst in Ludwigshafen, the scene of his life's work. If he were able to, he would perhaps say, 'Why all this?' And we would answer him 'You, who throughout your life have served others, are now rendering us your last service.' A few weeks ago he once again visited our works. Full of the spirit of initiative that was so characteristic of him, he showed interest in the progress of research work and inspected pilot plants and new production plants. On the occasion of this visit as on other occasions, the impressions he gained during these visits were projected into his co-workers in the form of incentive. When taking his leave that day, which seemed to him a holiday, as did all the other days he spent in his works, he pronounced the simple words 'Carry on'. We know what these words meant and how he wanted them to be understood. We will carry on along the path which he laid out for us, - untiring warriors in the search for the truth of the laws of Nature, champions in the struggle for technical mastery of natural phenomena, soldiers fighting thus for our dear Germany and for the progress of the whole human race. With this pledge, particularly we

Document Wurster

Doc. No. W 562

Exh. No.

-2-

men of Ludwigshafen and Oppau want to thank him by our deeds for all the confidence and all the faith with which he honored us, and now, for the last time, we bid farewell to our greatest workers, to our most faithful comrades."

It is hereby certified that the above is a true and correct copy of the excerpt from the supplement to the May issue 1940 of the I.G. Farbenindustrie Aktiengesellschaft Gazette "From Works to Works".

Nuernberg, 10 February 1946

signed: Dr. Wolfgang Heintzeler
Attorney-at-Law

-12-

Document Wurster

Doc. No. 188

Ech. No.

Affidavit

We, the undersigned, namely

- 1) Eugen Tournier, born 4 June 1897 in Firmsens, residing in Ludwigshafen on Rhine, Riedstrasse 60, employed since 1911 with the Badische Anilin- & Soda-Fabrik in Ludwigshafen on Rhine, at first as a laboratory assistant and later, up to the present time, as laboratory technician in the research laboratory;
- 2) Eugen Hartlaub, born 16 December 1898 in Ludwigshafen on Rhine, residing in Ludwigshafen on Rhine, Ebertstrasse 26, employed since 1913 as a laboratory assistant in the research laboratory of the Badische Anilin- & Soda-Fabrik in Ludwigshafen on Rhine,

have been warned that we shall render ourselves liable to punishment if we make a false affidavit. We declare that our statements are true and know that they will be produced in evidence in Case 6 before the American Military Tribunal at the Palace of Justice in Nuernberg.

In 1919, 1920 and 1921, during the long university vacations, Dr. Carl Wurster worked in our laboratory as so-called "Student Worker" (Workstudent). During these years, the period during which he worked amounted to approximately three to four months per year. At that time we also had other work students in our laboratory. Student worker

Document Wurster

Doc. No. 188

Exh. No.

-2-

Carl Wurster, however, attracted special attention by his extraordinary diligence, perseverance and the interest he showed in all problems which occupied us. He soon established friendly relations with the people employed in the laboratory and, contrary to the attitude adopted by other works students, he did not display any arrogance towards people who had not had the benefit of a University education. In the opinion of all of us, he was a progressive kindhearted person, devoted to his science and desirous of serving the community.

Later on, when he entered the employ of the Badische Anilin- & Soda-Fabrik in Ludwigshafen on Rhine as a chemist, we also had the opportunity to observe him and often had dealings with him. Even after he had become Director, his behavior towards us and the other co-workers continued to be extremely kind and friendly, and he even refused to be addressed as "Director", an attitude which did not conform with the tradition of the Badische Anilin- and Soda-Fabrik. Many employees of the Badische Anilin- & Soda-Fabrik were much gratified over his appointment as director in view of the fact that a young man had acquired a leading position by virtue of his own efforts and entirely without favoritism and that he managed the works in a democratic manner. A new trend resulted from his appointment as director because a man of an entirely new type had become the head of the plant. When we say a "man of an entirely new type", we mean to say a man who considered every employee his co-worker, who recognized no class-distinction and whose aim was the common weal.

-14-

Document Wurster

Doc. No. 188

Exh. No.

-3-

We hereby expressly declare that we were not members of the National Socialist Party.

Ludwigshafen on Rhine, 20 October 1947

signed: Tournier Eugen

signed: Hartlaub Eugen

The above signatures of Herr Eugen Tournier and Herr Eugen Hartlaub were appended before me, Friedrich Wilhelm Wagner, Attorney-at-Law, Ludwigshafen on Rhine, Schlosshausstr. 32, and are hereby certified and attested by me.

Ludwigshafen on Rhine, 20 October 1947

signed: F. W. Wagner

Attorney-at-Law

Document Wurster

Doc. No. | W 387
Exh. No. | 1

Copy.

Affidavit.

I, the undersigned, Wilhelm Scherer, Seifelsberg, Kapellenweg 11, have been duly warned that I shall make myself liable to punishment by making a false statement. I declare on oath that my statement is true and that it was made in order to be submitted as evidence to the Military Tribunal in the Palace of Justice in Nuremberg, Germany.

Since 1919 I have been employed in the Patent Department of the Badische Anilin & Soda Fabrik in Ludwigshafen a.Rh. (formerly I.G. Farbenindustrie Aktiengesellschaft). Amongst other things, I was charged with keeping the index of inventors. According to this index, Dr. Carl Wurster is designated as either the inventor or co-inventor in connection with the following Letters Patents:

1) German Patents:

German Reich Patent	No.	459 073
"	"	503 884
"	"	514 571
"	"	524 712
"	"	525 560
"	"	525 743
"	"	527 035
"	"	529 806
"	"	530 892
"	"	561 310
"	"	582 568

2) Foreign Patents:

U.S.A. Patent	1 842 535
British Patent	271 016
U.S.A. Patent	1 962 194

Document Wurster

Doc. No. : W 287

Exh. No. :

-3-

French Patent	545 335
Swiss Patent	134 359
British Patent	269 028
French Patent	519 066
U.S.A. Patent	1 809 158
British Patent	281 491
" "	307 524
" "	306 308
Swiss Patent	143 564
U.S.A. Patent	1 901 406
French Patent	710 166
Swiss Patent	152 244
U.S.A. Patent	1 854 584
British Patent	336 668
French Patent	884 596
Swiss Patent	146 615
Italian Patent	267 565
Swedish Patent	72 266
British Patent	342 208

Ludwigshafen a.Rh., 9 March 1948

signed: Wilhelm Scherer

I, Dr. Wolfgang Heintseler, Attorney-at-Law, Ludwigshafen a.Rh.,
herewith certify the above signature of Wilhelm Scherer, living in
Heidelberg, Kapellenweg 11, which was appended in my presence.

Ludwigshafen a.Rh., 9 March 1948

signed: Dr. Wolfgang Heintseler
Attorney-at-Law

-17-

Document Wurster

Doc. No.: 275

Exh. No. 1

Copy

Affidavit.

We, the undersigned,

Robert Storch, born 15 May 1890, living in Ludwigshafen a.Rh., Leuschnerstr. 32, business man, employee of the Badische Anilin & Soda Fabrik, Ludwigshafen a.Rh., from 1915 onwards, and member of the staff of the Personnel Department in charge of the Division dealing with directors and prokurists from 1932 onwards, and

Hans Morgenthauer, born 30 March 1900, living in Ludwigshafen a.Rh., Siemonstr. 6, business man, employee of the Badische Anilin & Soda Fabrik, Ludwigshafen a.Rh., from 1916 onwards, and secretary to Director Dr. Wurster from 1936 onwards,

have been duly warned that we shall make ourselves liable to punishment by making a false statement. We declare on oath that our statement is true and that it was made in order to be submitted as evidence to Military Tribunal No. 6 in the Palace of Justice in Nuernberg, Germany.

On the basis of existing documents, we confirm that, over a period of years, Dr. Wurster's total net income, by far, the greater part of which consisted of the salary received by him in his capacity as member of the Vorstand of the I.G. Farbenindustrie Aktiengesellschaft, was as follows:

Document Writer

Doc. No. : 275
Exh. No.

-2-

For 1936	RM. 49,038.--
" 1939	" 45,974.--
" 1940	" 47,845.--
" 1941	" 46,540.--
" 1942	" 47,543.--
" 1943	" 46,791.--
" 1944	" 47,184.--

signed: Robert Storch

signed: Hans Morgenthau

Wilhelm

I, Friedrich Wagner, Attorney-at-Law, Ludwigshafen a.Rh., Schloss-
hausstr. 33, herewith certify the above signature of Robert Storch
and Hans Morgenthau, which were appended in my presence.

Ludwigshafen a.Rh., 1 March 1946

signed: F.W. Wagner

Attorney-at-Law

DOCKUMENT WURSTER

Doc. No. W 365

Exh. No. 398

AFFIDAVIT

I, Dr. Ernst August STAUSS, Director of I.G. Farbenindustrie A.G. from 1934 until 1945, chief of the TLA-Bureau of I.G. Farbenindustrie A.G. from 1926 until 1945, secretary of the Technical Committee of the Vorstand of I.G. Farbenindustrie A.G. from 1924 until 1945, head of (the) Sparte II (Department) of the Vernichtungsanstalt W, and from 1943 until 1945 production head of the entire German dye industry in the framework of the Economic Group Chemical Industry and since 1 December 1945 employee of the Control Office I.G. Farbenindustrie (OMGUP) Frankfurt/M., APO 957, U.S. Army, after having first been warned that I am liable to punishment for a false statement, state herewith under oath of my own free will and without coercion the following:

1) In the table NI - 10029 the defendant Dr. Carl WURSTER is listed as head of the Works Combine Upper Rhine. The impression can thereby be conveyed that all of the plants enumerated under Upper Rhine, had been placed under this direction (unterstellt). With respect to this I state that the table NI - 10029 was prepared by me only from purely technical points of view. I have furnished an explanation concerning the details of this table in the study NI-9487.

2) From the comment in this study concerning Dr. MUELLER-GUEHRMANN on page 30 and concerning Dr. WURSTER on page 35, it appears that Dr. WURSTER was plant leader (Betriebsfuhrer) within the meaning of the Law of National Labor (in Sinne des Arbeitsordnungsgesetzes) only for the plants Ludwigshafen and Oppau and therefore was responsible as regards his functions as plant leader (Betriebsfuhrungsgeschaeft) only for these two plants.

DOCUMENT WURSTER

Doc. No. W 265

Exh. No. 392

-2-

3) As regards technical tasks, he was in charge of the inorganic divisions of the plant Ludwigshafen, while Dr. AMEROS was charged with the direction of the organic divisions of the plant Ludwigshafen.

4) Dr. WURSTER was in no way responsible for the plants supervised by Dr. MUELLER-SCHLÖDI and Dr. AMEROS outside of Ludwigshafen, neither in regard to technical problems nor as plant leader (Betriebsführer).

I have carefully read the foregoing statement, consisting of two pages, and have signed it with my own hand. I have made the necessary corrections in my own handwriting and countersigned them, and declare herewith under oath that I have stated the full truth to the best of my knowledge and conscience.

(s) Dr. Ernst A. Struss

(t) DR. ERNST A. STRUSS

Sworn to and signed before me this 26th day of August 1947 at Nurnberg, Germany, by Dr. Ernst A. STRUSS, known to me to be the person making the above affidavit.

(s) Albert G.D. Levy

(t) ALBERT G.D. LEVY

U.S. Civilian

AGO No. D 434708

CERTIFICATE OF TRANSLATION

I, ALBERT G. D. LEVY, AGO D 434708, hereby certify that I am thoroughly conversant with the English and German languages and that the above is a true and correct translation of Document No. NI - 10158 .

26 August 1947

ALBERT G.D. LEVY

U.S. Civilian

AGO No. D 434708

-21-

Plan of the Ludwigshafen - Oppau plant

as on 1 January 1954

Scale 1:5000

(will be submitted separately)

CopyA f f i d a v i t .

The undersigned

a) Rep. Baumeister Karl H a i s c h , Oberingenieur, Ludwigshafen/a. Rh.,
Bunsenstr. 4,

b) Dr. Fritz Mueller, Chemist, Ludwigshafen/a. Rh., Wochlerstr. 6,

have been duly warned that they will render themselves liable to
punishment by making a false statement. They declare on oath that
their statements are true and were made to be submitted as evidence
to the Military Tribunal in the Palace of Justice, Nuremberg,
Germany.

a) I, the undersigned Rep. Baumeister Karl H a i s c h , was
employed from 1 February 1937 onwards in the Building Department
of the Ludwigshafen works of the I.G. Farbenindustrie Aktiengesellschaft.

1) I certify that Wurster Document No. 1, Wurster Exh. No. 1,
intended for submission to Military Tribunal No. 6 in Nuremberg, is
a precise and correct photocopy of the official works plan of the
Ludwigshafen-Opau works of the I.G. Farbenindustrie Aktiengesellschaft
Ludwigshafen/a. Rh., now Badische Anilin- & Soda-fabrik, as it was on
1 January 1944, Scale 1:5,000.

2) I further certify that this works plan also depicts
correctly the conditions in the works and the individual camps and
buildings for the period from 1 January 1944 until the collapse.

apart, of course, from the damage sustained during this period from air attacks by the Allies. Finally, I certify that the colored marking of the different types of buildings in camps I to VII was done by me, and is correct to the best of my knowledge.

b) I, the undersigned Dr. Fritz Mueller, was entrusted during the war with the control of factory air raid precautions.

I certify that the air raid protection shelters in the works, drawn in in brown, represent the shelters which were near the communal camp; naturally there were numerous other shelters scattered throughout the works.

Ludwigshafen/a.Rh., 3 March 1948

signed: Karl Hirsch

signed: Dr. Fritz Mueller

I herewith certify and witness the above signatures made by

a) Reg.Baumdiener Karl Hirsch, Ludwigshafen/a.Rh., Bunsenstr. 4,

b) Dr. Fritz Mueller, Ludwigshafen/a.Rh., Wechlerstr. 6, before

Rechtsanwalt Friedr. Wilh. Wagner, Ludwigshafen/a.Rh.

signed: F.W. Warner

Attorney-at-Law

Organizational plan of the
Ludwigshafen-Oppau works submitted
separately.

Tables showing size and composition
of the staff of the Ludwigshafen-Oppau
works during the period from 1938
to 1945

submitted separately

DOCUMENT WURSTER

Dod. No. # 304

Exh. No.

Copy

Dr. Wurster's work as Betriebsfuehrer, member of the Technical Committee and of the I.G. Vorstand from 1 January 1938 onwards.

A f f i d a v i t .

I, the undersigned Dr. Carl Wurster, born in Stuttgart on 2 December 1900, resident of Ludwigshafen/Rhein, Woehlerstrasse 16a, at present in the prison of the Military Tribunal, Nuremberg, have been duly warned that I shall render myself liable to punishment by making a false statement. I declare on oath that my statement is true and was made for submission in evidence to Military Tribunal No. 6 in the Palace of Justice, Nuremberg, Germany.

1) The first of January 1938 brought a profound change in my professional career. Up to this date, as chief of the Inorganics Department of the I.G. Ludwigshafen works, I was one of many department chiefs in this works; in this capacity, and as chairman of the sub-committee for sulphur and sulphur compounds for the I.G. (Sulfur Uke) I was concerned chiefly with technical and scientific problems of research and manufacture in my special technical sphere; as chief of a Ludwigshafen Department, employing about 800 people.

I had certain organizational tasks, it is true, but these tasks consisted for the most part in the execution of measures ordered by the highest officials of the works management and by the administrative Departments of the works (Personnel Department, Social Welfare Department, etc.).

2) In 1938 I was faced with a completely new sphere of tasks, which were as follows:

- a) I became a " Betriebsfuhrer", in the meaning of the Law for the Organization of National Labor, for the whole of the Ludwigshafen-
Oppau works, which was at that time employing about 25,000 men.
- b) In addition to the technical supervision of the inorganics-plants of the Ludwigshafen works, I became answerable to a certain degree for several general departments and plants of the Ludwigshafen works as a whole.
- c) I became a member of the I.G. Vorstand, of which I had previously been only a deputy member, and a member of the technical and chemical committees. I still retained my post as chairman of the Sulfur-Wko.

3) I brought no other qualifications to the type of new posts and responsibilities described under point 2) than

my general training in chemistry and my experience from my former work as under point 1). In particular, I had no training and no experience in the field of the responsibilities of the Betriebsführer of a works employing 25,000 men, in so far as social welfare was concerned; I had no trainingⁱⁿ and no experience of financial or commercial matters either. In addition, the duties which suddenly fell to my lot as representative of the works were completely new to me; for example, before this time, I had never addressed a large gathering on other than technical and scientific subjects. From 1 January 1938 onwards, therefore, I was obliged to make intensive efforts to familiarize myself with all my new duties.

4) Of the new duties with which I was entrusted from 1 January 1938 onwards, those of Betriebsführer of the Ludwigshafen-Opau works appeared to me to be the most important. Before 1933, it had been usual for the Management of a major works to transfer a large proportion of the duties connected with social welfare to a so-called "Social Welfare Manager" (Sozialdirektor). After the passing of the law for the Control of National Labor of 1934, the Betriebsführer himself was to a considerable extent personally responsible for conditions in his works, and particularly for the safety of the staff entrusted to him.

DOCUMENT RESTER

Doc. No. N 304

Exh. No.

In this connection, I should like to mention that in so complex a technical undertaking as a chemical factory, the personal safety of the staff is an item of very special importance. Therefore, of all the new tasks entrusted to me from 1 January 1938 onwards, I regarded my work as Betriebsfuehrer as the most important and bestowed the greatest part of my attention on this field. The necessarily vast, indeed almost exclusive, concentration on this task naturally increased more and more during the war. The fact that thousands of Germans were drafted into the Wehrmacht and had to be replaced by other German and foreign workers, in conjunction with the general difficulties imposed by war conditions, gave rise to additional problems of all kinds, such as social welfare, procurement of the necessary billets and many other problems, which it became increasingly difficult to solve as the war went on. It goes without saying that the increasingly heterogeneous character of the personnel gave rise to problems of a special kind. Added to this was the occurrence of air raids, from which the works suffered for nearly 5 years. The air attacks on Ludwigshafen started as early as the beginning of June 1940 and increased progressively in force and intensity.

I devoted special care during the war to precisely this task of protecting the health and lives of the large staff that had been entrusted to me and, besides supervising the medical measures and measures of general hygiene, I saw to the proper carrying out, among other things, of suitable air raid precautions. Only in this way was it possible to reduce to tolerable limits the losses in life and limb among the factory staff, in spite of enormous material damage. In about 125 air attacks on Ludwigshafen, some of them very heavy, it was ascertained without doubt that 48,275 explosive and incendiary bombs were dropped on the works' area; the extent of the material damage caused amounted to over RM 400,000,000. As against this, during the whole war and out of a works' staff numbering from 30 to occasionally 40,000 people, only 427 members of the staff lost their lives in the works themselves and throughout the flats provided for employees and executives of the factory, as well as in the workers' camps. It would even have been possible to avoid many of these profoundly regrettable sacrifices, if the victims involved had not, out of carelessness, neglected to observe the precautions prescribed. Besides the personal protection afforded our staff in the works themselves, we also took measures surpassing

our legal obligations during the war to provide protective installations particular^{ly} in our widely scattered blocks of flats and workers' camps, which were occupied by thousands of our employees with their families. Thanks to the measures taken by us, the losses in life and limb were only a fraction of those that occurred in other residential districts, such as the town of Ludwigshafen and the neighbouring town of Mannheim.

- 5.) That ^{the} major proportion of my energy from 1938 onwards was devoted to the regular social welfare management of the works entrusted to my care, was made possible only because the technical-scientific side, responsibility for the management of which I shared with two technicians who were Vorstand members, was in proper order. I therefore dared not neglect the technical tasks in the Inorganics Sector of the Ludwigshafen Works, and technical questions of a general nature, in so far as they were subject to my authority and were my responsibility; for, in spite of the enormous extra burdens which the Law for the Regulation of Labor (Arbeitsordnungsgesetz) of 1934 imposed upon a "Betriebsführer", the I.G., of course deliberately adhered to the principle it had observed for many decades of having chemists at the head of the great works, and this profession to which I myself belonged continued to claim my entire devotion.
- 6.) I therefore put the basic principle of the scientist, which is to see things for oneself into practice in my capacity as Betriebsführer.

Almost daily I paid visits lasting several hours to the factory plants, and both on these occasions and in my office every member of the staff had, in principle, even if this involved by-passing the intermediate authorities, the possibility of laying his troubles directly before me, if he considered this necessary. My experience was that any possible fear that such an arrangement might be abused very soon proved to be without foundation and in any case were far outweighed by the advantage that a workmanager is in a position to obtain a true picture of the events as a result of direct dealings with employees of all groups.

In the beginning people were surprised whenever the chief paid them unexpected visits, riding his bicycle which enabled him to gain easy access to all parts of the plant. Soon, however, the employees welcomed his visits which gave them the desired opportunity of discussing their problems with him personally. I myself derived great benefit from these visits which often expressed itself in the form of suggestions for my co-workers in the Technical and Social Welfare sector. During the war I was especially

-8-

interested in visits to places where foreign workers were employed and housed, and I also talked with them. It was characteristic of the atmosphere of mutual confidence prevailing in this giant plant that throughout the entire war, there was not one single case of sabotage and that, throughout the entire war, it never occurred to me to take along a weapon or an escort on these visits - neither in day time nor at night.

- 7) Although, after 1 January 1938, I felt obliged to concentrate on the fulfilment of my duties in Ludwigshafen, I was nevertheless aware that, as member of the Vorstand and of the Technical Committee, I also had other obligations. In the early years of my membership of the Vorstand and the Technical Committee, I adopted on account of my youth a reserved attitude towards my colleagues who were, for the most part, considerably older than I, in order to get accustomed to their working methods and to the working conditions. In spite of the status of equality formally established for all members, it was only gradually that my feeling of subordination, especially, towards men who had formerly actually been my superiors, disappeared. All the same, it would have been a matter of course for me to intervene had I ascertained that something brought to my notice in the sphere of work of a co-worker

-9-

was not in order; but at no time was there any reason for any such intervention.

- 8) From our joint work in the Technical Committee and in the Vorstand I soon realized that every member worked on the assumption that each of his colleagues performed his tasks properly within his sphere of work. There was no reason, therefore, to concern oneself with the work of colleagues unless for the purpose of obtaining such general information as might be required. To deal thoroughly with the tasks of other colleagues would have been physically impossible because each of these colleagues was entrusted with actually an extensive field of work, which, during the war, was increased and intensified to such an extent that even an extremely efficient man was fully occupied by it. The difference in vocational training naturally called for a division of work and responsibility also.

- 9) The regular routine in the Technical Committee began with a technical or scientific lecture which was followed ^{by} discussions concerning loan applications. All these loan applications, of which up to 1,000 were submitted in some sessions, had been examined in detail and checked beforehand

by committees of experts appointed for this purpose, and their submission to the Technical Committee was subject to the approval of the appropriate committee of experts. Nevertheless in this circle one had to expect, of course, questions or objections or discussion. If necessary, each member of the Technical Committee was, when the loan applications were submitted or discussed, the spokesman for those applications which were of immediate interest to him. As far as I was concerned, that meant that I had to support all those loan applications of the Ludwigshafen Works in the inorganics field with which Sparte II was concerned, and, in addition, all loan applications for installations of a general nature, particularly those pertaining to social welfare in the Ludwigshafen Works. Moreover, I thoroughly prepared myself in order to be able to justify and to support all loan applications which were submitted by any of the works and which concerned the sphere of work of the Sulphur Sub-Commission of which I was the chairman. Finally, license agreements of various kinds were submitted to this body and here again I was the spokesman for the inorganics sector of the Ludwigshafen Works and for the Ludwigshafen license agreements of general nature, such as license agreements in the engineering sector.

Participation in discussion on other loans was, as a rule, only admissible if the interests of one's own works were in any way affected, e.g. in the case of the establishment of an additional production plant in other works.

In view of the careful work done on all projects in the sub-committees (Fachkommissionen), of which the most important were headed by technical experts from the Vorstand, everybody thought it a matter of course that the detailed examination which had taken place could be taken to be correct. Everybody would have thought it most uncharitable if a colleague's field of work were criticised without any special reason. Such a discussion would have been impossible merely in consideration of the time available and the number and extent of the loan applications under discussion. Thus the matter would have been returned automatically to the sub-committee (Fachkommission) concerned in order to be examined once more.

If this applied to loans in the sphere of technical work it applied still more to investments made in the sphere of social work. It was ultimately the member of the Technical Committee, responsible for the work in question, who had to know whether he stood in need of e.g. the establishment of a clinical hospital, whether he needed huts, and if so how many, whether and to what extent he had to improve the provisions for the maintenance of the workers in order to do justice to the requirements under consideration. I would not have permitted interference in such questions with relation to my plant, nor would any of my colleagues have done so, if I had expressed criticism or doubts concerning the necessity or usefulness of measures which they deemed necessary. Everything that happened in the Technical Committee was strongly influenced

by the fact that nearly all constructions planned were determined by Government orders (Anlagen) before they were proposed in the Technical Committee by the officials in charge. This was already taking place in the short period of time while I was a member of this body before the war, but to an especially great extent during the war. The question, whether an intended investment should be made or not, had nearly always been decided already by offices which had no connection with the I.G.

- 10.) I also applied the conception described above of my duties to my activities and responsibilities in my capacity as a member of the Vorstand. It was a matter of course for me - as incidentally for all other members of the Vorstand - that everybody in this circle too represented his own field of work and was responsible for it and gave only a rough sketch of it for the purpose of general coordination. A subsequent study of the minutes of the Vorstand confirms for me the correctness of this conception of mine.

It would have been at variance with every prevailing custom, when I entered this circle in 1938, if I had interfered in the affairs of other colleagues without any special reason, apart from the fact that it would not be possible at all from the purely physical point of view to acquire information even of a fraction of all that occurred in our firm.

by a merely superficial study of minutes and documents, and still less to express an opinion on it. As a result of this custom I do not even remember one single case where a vote was taken in a conference of the Vorstand or where the personal consent of the individual Vorstand members to some matter was requested. The information given contained for the most part reports on what had been done already rather than on what was planned, because consultation was not the custom prevailing in this body - in any case not at my time. It was a matter of course for everybody that each at his post fulfilled his duties and tasks properly and to the best of his knowledge and conscience, following a tradition which goes back decades. Thus only could this giant enterprise work without great losses resulting from friction.

Nuernberg, 17 December 1947.

signed: Dr. Carl WURSTER.

I, Friedrich Wilhelm Wagner, Attorney at Law, at present in the Palace of Justice Nuernberg, herewith attest and certify the above signature of Dr. Carl Wurster which was appended in my presence.

Nuernberg, 17 December 1947

signed: F.W. WAGNER

Attorney at Law.

Dr. Wurster's work as Chairman of the Sub-Committee for Sulphur, as member of the Inorganic Committee (Anko) and of the Chemicals Committee (Chama) of the I.G.

Affidavit.

I, the undersigned, Dr. Carl Wurster, born on 2 December 1900 in Stuttgart, residing at Ludwigshafen/Rhein, Wechelerstrasse 16a, at present in the prison of the Military Tribunal, Nuremberg, have been duly warned that I shall render myself liable to punishment by making a false affidavit. I declare on oath that my statement is true and was made in order to be submitted as evidence to Military Tribunal No. 6 at the Palace of Justice, Nuremberg/Germany.

- 1) I was chairman of the Sub-Committee for Sulphur from 1934 onwards. I have spoken of my activities in the field of sulphuric acid in a separate affidavit of 31 December 1947. In the course of this affidavit I should merely like to add the following statement on the working methods in this Sub-Committee of specialists:

It is characteristic that the chairman of such a committee, one of a board of experts on a certain subject, serving on equal terms, (first among equals) was *primus inter pares*./ This can be shown in my case by the fact that I was chairman even before I received powers of procura in the I.G., in spite of the fact that

-2-

the Committee included Prokurists and Directors at the time. When I retained the chair as a member of the Vorstand and comradely cooperation with the other members of the Sub-Committee did not change in any way.

- 2) In my capacity as Chairman of the Committee for Sulphur I belonged to the Inorganics Committee of the I.G. I was not chairman of this Committee as Dr. Struss stated by mistake in his affidavit of 5 January 1947, Exh. 321, Doc. NI - 5013, Doc. Book II, a statement which he corrected himself under cross examination. This Inorganics Committee brought the men in charge of the various inorganic Sub-Committees, e.g. Sub-Committee for Chlorine, Sub-Committee for Chromium, Sub-Committee for Sulphur etc. and the men in charge of the various inorganic laboratories of the I.G. together at fairly regular intervals of 3 months, for a conference lasting several hours. This was done in order to give a production preview for the following 3 months of the most important inorganic products of Sparte II in the presence of the commercial men in charge of the products concerned. The commercial experts outlined the sales facilities or additional sales requirements. The production plan for the coming quarter was then adapted to these facilities and requirements, the technical conditions being taken into consideration at the same time.

Document Wurster

Doc. No. W 306

Exh. No.

-3-

During the second part of this conference the heads of laboratories reported on their plans and on projected expenditure for research purposes in the field of inorganic chemistry within Sparte II. After due discussion, certain budgets were approved for research and experimental work for the coming quarter.

- 3) When I entered the Vorstand of the I.G. in 1938 I became a member of the Chemicals Committee (Chem.) as one of the representatives alongside my "inorganics colleagues" Dr. Kuchel and Dr. Burgin of the interests of I.G. in connection with the manufactured inorganic products. I had to represent mainly the interests of the Sub-Committee for Sulphur and the inorganics plants of the Ludwigshafen works in this committee which was composed of technical and commercial experts. Besides the manufacture of inorganic products, this body also discussed problems of business connections at home and abroad, the granting of licences and similar matters.

Munich, 8 January 1948

signed: Dr. Carl Wurster

I, Friedrich Wilhelm Wagner, Attorney-at-Law, at present in the Palace of Justice, Munich, herewith attest and certify the above signature of Dr. Carl Wurster, which was appended in my presence.

Munich, 8 January 1948

signed: F.W. Wagner

Attorney-at-Law

Copy

A f f i d a v i t .

I, the undersigned Hans Morgenthau, business man, born on 30 March 1900 at Ludwigshafen/Rhein, residing at Ludwigshafen/Rhein, Siemensstrasse 6, have been warned that I shall be liable to punishment for making a false statement. I herewith declare under oath that my statement is true and was made in order to be submitted as evidence to the American Military Tribunal at Nuremberg for the Case 6.

1) In 1916 I entered the services of the Badische Anilin- & Sodafabrik Ludwigshafen/Rhein as a member of the commercial staff. From January 1938 onwards, I was private secretary to Direktor Dr. Wurster who had become a member of the Vorstand of the I.G. Farbenindustrie Aktiengesellschaft and Betriebsführer of the Ludwigshafen-Opau plant on 1 January 1938. Having worked in this capacity, I am in the position to give the most precise information on the way in which Dr. Wurster fulfilled his numerous duties.

2) When on 1 January 1938, Dr. Wurster entered upon his manifold duties, all of which were absolutely new to him, he devoted considerable energy to the task of familiarizing himself with his numerous ^{new} duties as quickly as possible. Dr. Wurster approached these new tasks most seriously and with a deep sense of responsibility. In the early period from 1938/39 and particularly during the war, when the air-raids on the Ludwigshafen-Opau plants started at a very early date, one could frequently perceive most distinctly how heavily the burden of responsibility for

DOCUMENT WURSTER

Doc. No. W 225

Exh. No.

the life and well-being of the staff entrusted to him, lay on his shoulders. Dr. Wurster considered his task as Betriebsfuehrer of the Ludwigshafen-Opau plant and official responsible for the social welfare in this works as the most important and greatest of all his many duties. It can be said without exaggeration that he devoted both time and energy unstintingly to welfare work for the people under his care.

3) Dr. Wurster's working hours surpassed by far all normal limits. He stayed in the factory until late in the evening and frequently worked at home until far into the night in order to complete those important duties for which he had neither time nor peace of mind in the factory during the turbulent hours of the day. The same goes for Saturday afternoons and often for Sundays also. This was necessary in spite of the astonishing speed with which Dr. Wurster worked, because he would otherwise have been quite unable to complete his many and various tasks with the care which his tremendous sense of duty had made his law.

4) The day time in the factory was frequently taken up by meetings and conferences. It was Dr. Wurster's point of view and his principle that every member of the plant irrespective of rank and position, should have free access to the Betriebsfuehrer, in order that the Betriebsfuehrer could learn what was actually happening in a big plant of this kind. Thus on many a day there was an uninterrupted chain of visitors to see him. Moreover,

Dr. Wurster continued even at times when the workload was heaviest, to visit the factory as often as possible, in order to gather information on the spot on conditions and events in the plants and laboratories. Thus he often spent several hours cycling on his rounds, appearing now here and now there. During the war he frequently visited the camps where the foreigners who worked in the plant were billeted also. Dr. Wurster returned to the office with many suggestions and ideas, in connection both with the plant and with the well being of the staff.

In addition, much time was also taken up by the frequent conferences of which I should like to mention only the most important, viz. the so-called Management Mail Conference (Direktionspost-Sitzung) which took place every week or every second week and the conferences of the Works Council (Betriebsrat) which occupied several hours of Dr. Wurster's time every three to four weeks.

5) It was inevitable in an enterprise of this size that a man in Dr. Wurster's position frequently had to travel in order to take part in conferences out of town or for the purpose of negotiations at home or abroad. The following figures, compiled by me on the basis of available data, demonstrate how much time was taken up by the trips:

DOCUMENT WÜRSTER

Doc.No. W 225

Zsh.No.....

In 1938 his journeys occupied	149 days;
" 1939 " " "	110 days;
" 1940 " " "	110 days;
" 1941 " " "	95 days;
" 1942 " " "	98 days;
" 1943 " " "	68 days;
" 1944 " " "	40 days.

The yearly decrease in the number of days spent in travelling is accounted for by the fact that, as the air raids grew in intensity, so Dr. Würster was more and more intent on being permanently in the plant in order to be able to help in emergencies; consequently, during the war years he took part ^{only} in those meetings and conferences outside Ludwigshafen proper at which his presence was absolutely necessary.

6) It is scarcely necessary to mention separately the fact that the various duties falling to him as representative of the works took much of the Betriebsführer's time, if the size of the Ludwigshafen-Opau plant is taken into consideration. Not only commitments within the plant, e.g. the honoring of employees with a period of 25 - 40 years' service were involved, but also the many celebrations arranged by the city of Ludwigshafen or the Palatinate from which the head of the biggest industrial plant of the area could not be absent.

7) The mail/arriving daily for Dr. Wurster was very extensive. The incoming letters were received by me and it was my task to screen them in order to find out what should be submitted to Dr. Wurster personally on account of its importance, and what could be forwarded immediately to the competent plant offices. The content of/incoming mail was frequently so great that it would have been physically quite impossible for Dr. Wurster to read everything himself. For this reason, I was ordered to forward all the numerous minutes of conferences etc. which did not immediately concern Dr. Wurster's sphere of activity direct to the experts concerned.

8) Dr. Wurster kept himself informed of events in the plant even when he was on vacation, in order to be able to intervene at any time should emergencies arise. Dr. Wurster took his last vacation in 1943. He interrupted even this vacation for a few days, because a major disaster had occurred in the plant, following the explosion of a tank car. This was his last vacation during the war. Dr. Wurster later felt that in consideration of the increasing intensity of the air raids an absence of several days from the plant was not justifiable.

Ludwigshafen/Rhein, 26 January 1948

signed: Hans Morgenthau

DOCUMENT MURSTER

Doc. No. W 225

Edh. No.

I, Dr. Wolfgang Heintzeler, Ludwigshafen/Rhein, Brunckstrasse
13, herewith attest and certify the above signature of Herr
Hans Morgenthau which was appended in my presence.
Ludwigshafen/Rhein, 26 January 1948

signed: Dr. Wolfgang Heintzeler
Attorney at Law

I, Dr. Wolfgang Heintzeler, Ludwigshafen/Rhein herewith attest
and certify the signature of Herr Hans Morgenthau which was
appended in my presence.

CopyAffidavit

I, the undersigned, Professor Dr. Erich PIETSCH, born 6 May 1902 in Berlin, living in Clausthal-Zellerfeld, Altenauerstrasse 24, director of the Gmelin Institute of Inorganic Chemistry and border subjects in the Kaiser-Wilhelm-Gesellschaft for the Advancement of the Sciences, have been duly warned that I shall make myself liable to punishment by making a false statement. I declare that my statement is true and that it was made in order to be submitted as evidence to Military Tribunal No. VI in the Palace of Justice in Nuremberg.

I worked from 1 April 1925 onwards as a member of the staff of scientists, from 1 April 1927 onwards as Deputy Director and from 1935 onwards as Director of the Gmelin-Institute of Inorganic Chemistry and border subjects - formerly called ^{the} Gmelin-Editorial Office and also the Gmelin-Institute.

I herewith confirm that after the death of Geheimrat Dr. Carl Bosch, Dr. Carl Wurster became the latter's successor as President of the Adolf Bayer-Society for the Advancement of Chemical Literature ("Adolf Bayer-Gesellschaft zur Foerderung der chemischen Literatur"). The office of President was an honorary office. The authority carried by the office was based on purely scientific factors, completely unaffected by political considerations.

The Adolf Bayer-Society, with the cooperation of the German Chemical Society, promoted the compilation and publication of scientific-chemical literature, thus above all,

the Gmelin Handbook of Inorganic Chemistry, which was compiled by the Gmelin Institute.

The society took a practical interest in the fields of work which were entrusted to it and in the well-being of its co-workers. This was the case especially if they were in dire circumstances. Among them were included fellow-workers of foreign nationality, as well as my retired Jewish predecessor, Professor Dr. R.J. MEYER who was over 70 years old, and his family.

The Adolf Bayer-Society carried on its internationally acknowledged scientific activity during the war. This continuation of its activity was made possible above all by Dr. Wurster, who unselfishly put himself at the disposal of the society and by the fact that the funds and materials required by the Society were provided by the various circles of the chemical industry - particularly the I.G. As far as I know, the works of the chemical industry which belonged to the Adolf Bayer-Society raised these funds in the form of contributions which were graduated according to the number of the workers.

The Gmelin Institute could carry on with its projects only with the help of subventions from the Adolf Bayer-Society, which were given yearly in considerable amounts. No influence whatsoever, either political or economical, was exerted on the shaping of the Gmelin Handbook, and just as little on the management of the Institute which carried out its tasks basing its work exclusively on the academic and scientific factors. Dr. Wurster always carried out his work for the Gmelin Institute in a manner indicative of human sympathy, even comradely intent

DOCUMENT NUMBER
Doc.No. 168
Exh.No.

and unselfish outlook, free from any party-political tendencies
whatsoever, and thus gained lasting recognition for his work on
behalf of the Gmelin Institute and thus also of the Gmelin Handbook.

Clausthal-Zellerfeld, 8. November 1947

signed: PIETSON
(Prof. Dr. E. Pietsch)

Stamp:
Bergstadt
Clausthal-Zellerfeld

Signature certified by:
The City Director

by order:
signed: SCHMIDT

Clausthal-Zellerfeld, 8. November 1947

Document WURSTER

Doc. No.: 7594

Exh. No.:

Excerpt from the Affidavit by Professors

- 1) Dr. Adolf Hindius and
- 2) Dr. Otto Hahn

Document SCHWITZ No. 41
Schwits Document Book III

(Page 45)

We know 1) that the leading men of I.G. rendered outstanding assistance to research work in the field of Natural Science, 2) that they advocated the independence of research, not infrequently granting help and support to men persecuted on political and racial grounds, 3) that, through the discoveries and inventions of their firm, they contributed to an extraordinarily high degree to technical progress and, in the sphere of chemotherapy, to the well-being of mankind. We have always been proud of the achievements of I.G. Farbenindustrie in this direction.

(Page 46)

I. Support for Scientific Research

Dr. Carl Bosch and Dr. Carl Duisberg played important parts in events as early as the foundation by I.G. of the Emergency Society of German Science (Notgemeinschaft der deutschen Wissenschaft), but the thought which was uppermost in the minds of the leaders of the German Chemical Industry was the advancement of chemical research. For this purpose, three scientific societies,

the Adolf-Bayer-Gesellschaft, the Justus-Liebig-Gesellschaft and the Emil-Fischer-Gesellschaft, were founded. I.G. Farbenindustrie I.G.'s donations to these societies amounted to approximately 3/4 of the total contributions, while I.G.'s assets in relation to the German Chemical Industry as a whole are estimated at only 1/3. The Presidents of these societies were always officials of the I.G.

a) The purpose of the Adolf-Bayer-Gesellschaft was to support and assist the literary enterprises of the German Chemical Society, and in particular to ensure financial backing for the Chemisches Zentralblatt (Chemical Central Gazette) and the Gmelin "Handbuch der Anorganischen Chemie" (Manual of Inorganic Chemistry). Dr. Carl Brach was the first President, and was later followed by Dr. Arstor.

.....
(Page 51)
.....

to consider it our duty to call attention to the very beneficial work performed by the defendants, as their contribution to the advancement of science and technology, to the growth of civilization and the development of therapy and, in the realm of humanitarianism, to their deeds and works of genuine humankindness.

Signed: Adolf Indars (signed): Htc Hahn.

The above is a true and correct excerpt from the original document.

Nuernberg, 20 March 1948

Signed: Dr. Wolfgang Heintzeler
Attorney-at-Law

Copy

Affidavit

I, the undersigned Dr. Ernst K U S S, living in Duisburg, Parkstr. 9, have been duly warned that I shall make myself liable to punishment by making a false statement. I declare on oath that my statement is true and that it was made in order to be submitted as evidence to the Military Tribunal in the Palace of Justice in Nuremberg.

1) Since 1935 I have been Prokurist and Direktor of the Duisburger Kupferhütte and from 1939 onwards a member of its Vorstand.
2) The Duisburger Kupferhütte (D.K.) was founded in 1878 by several German sulphuric acid factories which were situated in Western Germany. Several of these - amongst others, the Badische Anilin & Soda Fabrik, Ludwigshafen a. Rh. - were among the companies which later founded the I.G. Farbenindustrie Aktiengesellschaft. In the beginning the task of the D.K. consisted in purchasing domestic and above all, foreign supplies of pyrites for these companies. The pyrites were roasted in the plants of the founder companies - thus in Ludwigshafen also - for the purpose of obtaining sulphuric acid. The Duisburger Kupferhütte received the residue, the so-called roasted pyrites, in order to extract from the same - and this was its additional job - the metals contained therein, such as copper, zinc, lead, iron, cobalt, silver, gold and the like, and in addition, the sulphur which had not been completely burned out by the sulphuric acid factories, in the form of sodium sulphate.

3) I have known Dr. WURSTER for many years, firstly through having worked with him in the Ludwigshafen Works of the I.G. Farbenindustrie Aktiengesellschaft; from 1938 onwards, I took part, as the representative of the Duisburger Kupferhütte for matters connected with the processing of pyrites and the utilization of the roasted pyrites, in the meetings of the so-called Sulphur-Subcommittee of the I.G., the chairman of which during that time was Dr. WURSTER.

4) When a change in the membership of the Aufsichtsrat of the Duisburger Kupferhütte took place - I believe in 1939 - it was the unanimous wish of the Vorstand and of the partners of the Duisburger Kupferhütte that Dr. WURSTER, as the chairman of the Sulphur-Subcommittee and an acknowledged expert in the field of sulphuric acid manufacture, should join the Aufsichtsrat of our company.

5) During this period, Dr. WURSTER attended eight meetings of the Aufsichtsrat. When visiting the Duisburger Kupferhütte he showed special interest in the scientific and technical progress in the laboratories and in the production plants as well as in the problems of obtaining domestic and foreign supplies of pyrites for the sulphuric acid plants of the I.G. which were under his supervision. In this connection he always advocated the cultivation and the further development of the friendly relations which we have maintained for decades with our numerous business friends abroad in the various countries of Europe.

6) The manner in which Dr. WURSTER carried out his duties as a member of the Aufsichtsrat of the D.K. was in keeping with his personality, which is characterized by strict impartiality, clarity of thought in matters economical and technical, deeply humanitarian feelings and the spirit of loyal international co-operation.

7) Dr. WURSTER did not receive any salary for his work as member of the Aufsichtsrat.

signed:

Dr. Ernst E U S S

Leverkusen, 6 February 1946

Signed in my presence on 6 February 1946 in Leverkusen by Dr. Ernst EUSS, known to me to be the person deposing the above affidavit.

Leverkusen, 6 February 1946

signed:

Dr. Ernst E B O E N

Dr. Ernst E B O E N
Assistant Defense Counsel

Tribunal Muensterberg.

First Copy.Number 5 in the Document Register for 1948

Registered in Minden (Westphalia) 16 January 1948.

Department Chief Dr. Botho M u l e r t of Minden (Westphalia) Bachstrasse 44, today presented himself ^{at} the office of the undersigned Notary Public

H u b e r t B e r g e n t h a l

in Minden (Westphalia) establishing his identity by the admission of identification card No. AT 822720 EHD and requested that the following

A f f i d a v i t

be certified.

The witness was duly warned by the Notary Public that he would make himself liable to punishment by making a false statement. He thereupon declared on oath that his statement was true and that it was made in order to be submitted as evidence to the Military Tribunal in the Palace of Justice in Nuremberg.

He declared the following on oath :

1.) During the years from 1922 to 1944 I was an official of the Reich Ministry of Economics and from 1938 onwards had the rating of a Ministerialdirigent. From 1938 until 1944 I was head of the Department for Chemistry. At the present I am working for the Economic Administration in Minden.

2.) In 1938 the Government authorities in Berlin decided, within the framework of the measures ^{for} the improvement of the food situation, to build a plant near Regensburg a.d.D., for the production of xylose and edible yeast from scrap wood by treatment with hydrochloric acid. The process had been developed by the Nobel-prize winner Prof. Dr. H a r g i u s . For the purpose of carrying out the project, a company called "Sued-deutsche Holzverzuckerungs A.G." was founded in Regensburg. The Reich made considerable sums of money available for the building of the plant and consequently had indirectly, a strong interest in the company as far as capital was concerned also. Therefore various representatives of the Reich's interests belonged to the Aufsichtsrat of the company, amongst others Dr. G r a n z o w of the Deutsche Rentenbank, who was chairman, and I myself.

3.) For the supervision of the technical and constructional side of the project, an architect was commissioned at that time who had formerly built mainly barracks and billets for the Luftwaffe and who had - as it soon became apparent - unfortunately no experience in the building of chemicals plants. Since the technicians who had been hired for the building and management of the plant did not have the necessary experience either, there seemed at approximately the end of 1938 very little hope of putting the plant into operation in the near future, although millions had already been spent on the project. I was aware that Dr. Carl W u r s t e r had, as an expert on sulphuric acid, special experience in the field of those chemical processes involving the use of acids. He was therefore asked to

give his advice on further building operations and on the starting of production in the Regensburg plant and, as far as possible, to help out with suitable technical personnel. Dr. Wurster complied with the request and put at our disposal a chemist, Dr. Strathmeyer who left the I.G. and joined the Vorstand of the Holzverzuckerungs A.G. With the help of Dr. Wurster and Dr. Strathmeyer it was then possible to get the factory started and to produce a satisfactory amount of edible yeast and xylose for the food market.

4.) Since we occasionally wanted to obtain the technical advice of Dr. Wurster even after Dr. Strathmeyer joined the Vorstand, Dr. Wurster was asked in 1940 or 1941 to join the Aufsichtsrat of the company. As far as I know, Dr. Wurster stated that he would be prepared to do so, on condition that he did not receive any remuneration and that he belonged to the Aufsichtsrat only as a non-regular member and did not have the privilege of voting. This wish was complied with.

5.) I know that the Regensburg factory was started up again by order of the American Military authorities soon after the German capitulation in order that it might make its contribution to the solution of the difficulties connected with the food supply.

DOCUMENT "URSTER

Doc. No. W 246

Exh. No. 1

The above document was read to the witness; its truth was confirmed and the document signed by him as follows :

Dr. Botho M u l e r t

Hubert B e r g e n t h a l
Notary Public

The above document^{is} herewith drawn up on behalf of Abteilungs-
leiter Dr. Botho M u l e r t in Minden (Westphalia), Bachstr. 44.
Minden, (Westphalia) 16 January 1948

signed :

Hubert Bergenthal
Notary Public

Stamp :
Hubert Bergenthal
Notary Public
Minden (Westphalia)

Charges: (Paragr. 24, Section 3, 2 RKO)
Value of the Transaction 3,000.00 RM
Charges, paragr. 144, 26.43
Section 1, RKO 16.00 RM
Turnover Tax 3% - 48. "
16.48 RM

The Notary Public :

Signed : Bergenthal

DOCUMENT "URSTER"

Doc. No. 132

Exh. No.

Dr. Ernst Kamm
Vorstand of the Ludwigshafener Walzmühle
(Ludwigshafen Rolling-mills).

Ludwigshafen/Rhein, 2 January 1948

A f f i d a v i t .

I, Dr. Ernst Kamm, Director, Ludwigshafen/Rhein, Muhlstrasse 61, have been warned that I shall be liable to punishment for making a false statement. I declare on oath that the following statements of mine are true and were made in order to be submitted as evidence to the American Military Tribunal at the Palace of Justice, Nuernberg.

1. I have been an employee of the Ludwigshafener Walzmühle A.G., Ludwigshafen/Rhein since 1931. Since 1938 I have been a member of the Vorstand.

From 1932 onwards I belonged to various sub-committees of the Chamber of Industry and Commerce for the Palatinate, Ludwigshafen/Rhein: The Chamber of Industry and Commerce for the Palatinate is the autonomous organisation of Industry and Commerce in the Palatinate and has been in existence for a long time. During the Third Reich I was compelled at the instigation of the Party to discontinue my activities in the sub-committees of the Chamber of Industry and Commerce toward the end of 1942 for reasons of political unreliability. After the collapse I was declared "cleared" by the denazification committee competent for the Palatinate.

DOCUMENT WURSTER

Doc. No. 133

Exh. No.

2. I have known Dr. Karl Wurster personally for years. When he became President of the Chamber of Industry and Commerce for the Palatinate in May 1941 his appointment to this position was hailed particularly by wide industrial circles in the Palatinate for the following reasons :

Dr. Wurster's appointment took place at a time when the assumption of power by the State and the Party in industrial matters was increasing more and more as the war situation came to a head. The Party in particular was intervening more and more in economic and industrial questions. People hoped that Dr. Wurster's appointment ^{would} as President of the Chamber of Industry and Commerce ~~mean~~ an effective counterweight against these pretensions of the State and in particular of the Party. This, because Dr. Wurster's influence as head of the biggest industrial plant of the Palatinate was very considerable. He was considered an upright, objective and honest man. Moreover a section of the industrialists in the Palatinate, including myself, knew that Dr. Wurster identified himself in no way with National Socialist ideas and had already successfully opposed Party efforts on several occasions.

3. While the Chambers of Industry and Commerce once had had important functions in the economic life of Germany, during the Third Reich they became increasingly unimportant the more the State and the Party succeeded in assuming power. When Dr. Wurster was President of the Chamber of Industry and Commerce for the Palatinate in Ludwigshafen/Rhein, all questions of economic policy were no longer decided by the Chamber of Industry and Commerce but by the Gauleitung and the Economic Consultant of the Party for the Gau (Gauwirtschaftsberater).

The Chamber of Industry and Commerce was left with the sole task of representing the wishes, suggestions and interests of industry in dealings with State and Party officials. Within these narrow limits left to the President of a Chamber for Industry and Commerce, Dr. Wurster fulfilled all the expectations of that section of the industry of the Palatinate which considered that his appointment would counterbalance the dictatorship of the Party. As far as I could observe he never did anything in any case which could be considered as promoting the aims of the Party.

4. At the outset of 1943, the Chamber of Industry and Commerce for the Palatinate at Ludwigshafen/Rhein was merged with the Artisans' Chamber for the Palatinate in the course of a re-organisation of the industrial economy to form the Chamber of Economy Ludwigshafen/Rhein. Dr. Wurster was President of this Chamber of Economics from then onward. What I have said about his activities as President of the Chamber of Industry and Commerce goes equally for his later administration as

DOCUMENT MURSTER

Doc. No. 133

Fdn. No.

President of the Chamber of Economics.

5. The extent to which industry, especially that section of industry which knew Dr. Murster best, trusted him appreciated his technical and personal qualities and knew how to appreciate his political attitude towards the regime of the Third Reich, can be seen from the fact that when the Chamber of Commerce and Industry was reorganized after the collapse, people attempted seriously to make Dr. Murster Chairman of one of the Professional Associations to be established within the Chamber of Industry and Commerce. I know that the industry represented in this Professional Association several times unanimously expressed its desire to have Dr. Murster take over the position of Chairman. The new presidency of the Chamber of Industry and Commerce (which had been recently resuscitated to replace the Chamber of Economics) went even further by attempting to have Dr. Murster, if not as Vicepresident ~~at least~~ as a Member of the Advisory Council.

Signed : Dr. E. Kamm

I, the undersigned, Dr. Wolfgang Heintzeler, Attorney-at-Law, certify herewith that the above signature of Director Dr. Ernst Kamm, Ludwigshafen/Rhein, Muehlstr. 51 was made in my presence to-day.

Ludwigshafen/Rhein, 2 January 1948

signed : Dr. Wolfgang Heintzeler
Attorney-at-Law

District Association Chemical Industry
in the Palatinate
Telephone B497 extension 3934
Bank Account : Rhein-Kreditbank, Ludwigshafen a.Rh.
Postal Checking Account : Ludwigshafen a.Rh. No. 21861

(22b) Ludwigshafen a.Rh. 29 January 1948
Friedenheimerstrasse 105
Dr. Loew.

S t a t e m e n t .

After the collapse in April 1945, Dr. Carl Wurster was instated by the American Military Government as chairman of the Technical Association Chemical Industry.

After the occupation changeover in July 1945 Dr. Wurster resigned from office and requested that he should not be re-elected. In spite of this his appointment as Chairman of the Technical Association Chemical Industry was unanimously renewed in a secret ballot, in agreement with the representative of the French Military Government in Ludwigshafen am Rhein, at that time, Comm. Carpentier. In January 1946 Dr. Wurster pointed out that there had still been no final agreement to his appointment from authoritative official quarters, and that he would therefore not act as Chairman. In October 1946 Dr. Wurster did not take up the office of chairman and requested that someone else be entrusted with the position. This request was then complied with.

Even during the war, Dr. Wurster had held the office of chairman for the District Association Saar/ Palatinate of the Economic Group Chemical Industry. His administration was invariably unpolitical.

DOCUMENT WURSTER

Doc. No. W 223

Edh. No.

He always endeavoured to settle the difficulties of all members of the association in an impartial manner, and made a special effort when representing the interests of the smaller industrial firms. His outstanding personality, his sincerity of character and his unusual technical knowledge, led him to make decisions which must be considered as excellent in every respect, even from a moral and humane standpoint. This is most clearly apparent from the fact that even after the collapse, as mentioned above, Dr. Wurster still enjoyed the complete confidence of all the contractors in the Palatinate chemical industry.

THE VORSTAND
OF THE DISTRICT ASSOCIATION CHEMICAL INDUSTRY
IN THE PALATINATE.

Chairman of the Vorstand :

Signed : Signature

Stamp :
Deputy Vorstand Chairman

signed : Signature

The Treasurer

signed : Signature

Affidavit.

I, the undersigned, Dr. Hans Storch, residing in Waldhilsbach, Hauptstrasse 48, have had my attention drawn to the fact that it is a punishable offense to make a false affidavit. I herewith declare on oath that my statement corresponds to the truth, and was made in order to be presented as evidence in Case 6 before the Military Tribunal in the Palace of Justice, Muenberg, Germany.

- 1.) From 1935 to 1939 I was local Group Leader of the NSDAP for the local group Ludwigshafen-Hemshof, and thereafter served as a soldier from 1939 to the end of the war. The territory covered by the local group Ludwigshafen-Hemshof included the workers' colony of the Ludwigshafen factory of the I.G. Farbenindustrie Aktiengesellschaft.
- 2.) I have known Dr. Wurster for several years. Having formerly been the competent local Group Leader I have exact information on the events leading up to his entry into the Party, and can give fullest details on the subject.
- 3.) Even before his final entry into the NSDAP, I talked to him on several occasions about his party membership. On these occasions Dr. Wurster took the view that since he had never belonged to any political party before, he saw no reason why he should now become a member of the NSDAP.

4.) After Dr. Wurster had become a member of the Vorstand of the I.G. Farbenindustrie Aktiengesellschaft and Betriebsführer of the Ludwigshafen-Opau plant on 1 January 1938, Bierckel, the competent NSDAP Gauleiter, and Kleemann the NSDAP Kreisleiter for the district of Ludwigshafen, were insistent on the importance of Dr. Wurster's now becoming a party member. The Gauleiter took the view that the influence of the party would increase in the I.G. Ludwigshafen factory if Dr. Wurster were placed under the disciplinary sphere of action of the party by his membership of the party. Dr. Wurster was naturally reticent in his statements to me, but I can assume with certainty that from reverse considerations he refused as long as possible to become a member of the Party, simply because he wished the works management to be independent of the party for as long as possible.

5.) When Dr. Wurster had repeatedly refused to become a voluntary party member, I, being the Local Group Leader at that time, received during the second half of 1938 - I forget the exact date - the order from the Gauleitung by way of the Kreisleitung, to hand Dr. Wurster forthwith the decree relating to his entry into the NSDAP. Dr. Wurster is thus one of the very few party members of the former NSDAP Local Group Ludwigshafen - Hemshof, whom one can actually in the truest sense of the word, describe as a "Forced Party Member".

6.) Even after his entry into the party as decreed ^{by} the Gauleitung, Dr. Wurster never did the slightest work either for or in the Party, nor did he make voluntary contributions thereto. Dr. Wurster's attitude

DOCUMENT HURSTER

Doc. No. 186

Edh. No.

on the occasion of the handing-over of the membership papers convinced me that his membership of the Party in no way reflected his convictions and that he probably saw through the intentions of the Party leaders that lay behind his membership. All that was left for him to do, however, was to make the best of a bad job.

Waldhilsbach, 2 January 1948

signed: Dr. H. Storch

I, Dr. Wolfgang Heintseler, Ludwigshafen am Rhein, Brunckstr.13, herewith certify and witness the above signature of Dr. Hugo Storch, who signed in my presence.

Waldhilsbach, 2 January 1948

signed : Dr. Wolfgang Heintseler.

FFIDAVIT.

I, the undersigned Joseph EAST, commercial employee of the RLSF, Ludwigshafen/Rhein, born on 10 October 1909, resident at Schifferstadt, Spayerstrasse 20, have been warned that I shall be liable to punishment for making a false statement. I herewith, declare under oath that my statements are true and were made in order to ^{be} submitted as evidence in Case 6 to the Military Tribunal, Ruernberg.

When I was in charge of the plant radio center of the RLSF during the last years of the w/r, I received a radio message from Berlin on 21 March 1945 late in the evening, which "once more summoned" Director Dr. Huester "to travel to Berlin immediately". Without delay I forwarded the message to Dr. Huester by telephone, and learned only a few hours later, shortly past midnight, that he had decided in the interests of the plant not to comply with the summons.

Ludwigshafen/Rhein, 27 October 1947

signed Joseph East

Document MUSTER

Doc. No. 102
Exn. No.

I, Attorney at Law Friedrich Wilhelm Wagner, Ludwigshafen/Rhein,
Ludwigsplatz 1 herewith certify and confirm that the above
signature, made in my presence, is that of Joseph Bast.

Ludwigshafen/Rhein, 27 October 1947

signed F.W. Wagner
Attorney at Law

DOCUMENT WURSTER

Doc. No. 549
Exh. No.

Copy.

Document Speer
No. 37 Speer

Speer Exhibit No. 25

73

Hitler's Demolition Order dated 19 March 1945

Teletype

To Reich Minister Speer

Copy to :

On 19 March 1934 the Fuehrer issued the following order:

Subject: Demolition in the Reich.

The struggle for the very existence of our people in which we are engaged compels us to use, even within the Reich, all the means which might weaken the fighting power of our enemies and which might prevent them from making further progress. Every chance must be taken to weaken the enemy's striking power as much as possible. It is an error to believe in the possibility of putting back into operation when areas lost to the enemy are regained traffic and information installations, industrial plant and supply facilities which have not been destroyed or which have only been temporarily crippled. The enemy will leave nothing in his wake but scorched earth and will show no consideration whatever for the population.

I therefore decree the following :

DOCUMENT WURSTER

Doc. No. 549

Pub. No.

- 1) All military traffic and information installations, industrial plant and supply facilities, and assets in the Reich which the enemy might use either now or in the near future to enable him to continue the struggle, will be demolished.
- 2) The military authorities will be responsible for the execution of these demolitions as far as military installations, including traffic and information facilities, are concerned; the Gauleiters and Reich Defense Commissars will be responsible for the execution of this order as far as industrial plant, supply facilities, and other assets are concerned; the armed forces will render to the Gauleiters and Reich Defense Commissars whatever assistance they might require in the execution of their duties.
- 3) This order will be communicated to all senior officers as soon as possible; instructions to the contrary are invalid.

signed: Adolf Hitler

OKW/WFSt/Op/34, No. 008711/45 top secret

Signed: Winter, Lieutenant General,
Deputy Chief West

This is to certify that the above is a true
and accurate copy of the original document;

Dr. Fleckhauer
Attorney-at-Law

This is to certify that the above document Speer Exhibit No. 25,
is a true and accurate copy of the mimeographed copy put at my
disposal by the Document Editorial IMT, Room 501 a, Palace of
Justice, Nuernberg.

Nuernberg, 19 January 1948

signed: Dr. Wolfgang Hainzeler
Attorney-at-Law

DOCUMENT WURSTER

CERTIFICATE OF TRANSLATION

5 April 1948

I, Leonard J. LAWRENCE, ETO # 20138, hereby certify that I am a duly appointed translator for the German and English languages and that the above is a true and correct translation of the Document Wurster No. 549.

.....
Leonard J. LAWRENCE
ETO # 20138

Specr Exhibit Nr. 28

Executive decree of HITLER 30 March 1945.

4. Approved by the Executive Board, 20 Feb 1945.

For unified execution of my decree of 19 March 1945 I command:

- 1) The ordered measures for destruction of industrial plants serve exclusively the purpose of making impossible the use by the enemy of those plants in order to rebuild his fighting forces.
- 2) In no case must the measures required weaken our own fighting forces. Production must be maintained to the limit possible at the moment, even when there is danger due to swift operations of the enemy that the plant may fall into his hands undestroyed. Industrial plants of all kinds, including industries of supply can only then be destroyed, when they are threatened imminently.
- 3) Where the total destruction of bridges and other traffic installations makes their use impossible by the enemy for a long period, the same result can be obtained by lasting paralysis of industrial plants, including industries of supply.

The total destruction of especially important plants will be determined by the Reich Minister for Armament and War Production by my orders (for instance, munitions works, most important chemical plants, etc.)

Document "URSTER"

Doc. No. 550
Exh. No.

- 4) The selection for paralysis and destruction of industrial plants and other works is made by the Gauleiter and Reich Commissioner for Defence, who supervises their execution. The execution is dealt with solely by the Offices and Organizations of the Reich Minister for Armament and War Production. In this connection all Offices of the Party, the State and the Army are to render assistance.
- 5) The provision for execution is published with my assent by the Reich Minister for Armament and War Production. He can give individual instructions to the Reich Commissioner for Defence.
- 6) These principles are valid according to their purport for the plants and installations in the immediate fighting zone.

signed ADOLF HITLER

Certified true extracts:

Dr. FLAUCHNER
Attorney-at-Law

I herewith certify that the above, Speer Document, Exhibit No. 28 is a true and correct copy of the document put at my disposal by the DNT Document Editorial, Room 501a, Palace of Justice, Nuernberg.

Nuernberg, 19 January 1948
signed: Dr. Wolfgang Hintzeler
Attorney-at-Law

DOCUMENT FURSTER
Doc. No. W 11
Edh. No.

I.G. LUDWIGSHAFEN

To the Staff of the Ludwigshafen
and Oppau Works.

A momentous and lengthy war which was connected with infinite suffering is now over. The last remnants of the German Wehrmacht have surrendered to the Allies.

Our first thoughts are dedicated to those who were killed, to the wounded and the sick of this war, and to the prisoners from among our ranks.

Wherever we look in our home country we see destruction and misery. Our plant which was once so beautiful, the mainstay and support of many thousands, was hit hard after 30 years of progress. We can not yet tell to what extent we shall be able to get our factories working again. The only thing that is certain is that we are poor, that we shall have to start all over again and that we shall have to economize stringently in existing stockpiles and money. This will lead to serious repercussions which many will not understand. But there is no sense in trying to deceive ourselves about the true situation any longer.

The management of the works and the representatives of the employees will do everything in their power to furnish employment and a means of livelihood for as many of the members of the staff as possible and to help those who need our support on account of advanced age and sickness. The problems which we are up against can be solved, after this complete collapse, only with immense difficulty and only with the understanding co-operation of everybody concerned. Conditions will improve only if we

DOCUMENT WERSTER
Doc. No. W 11
Exh. No.

labor, every one on the job to which he is ordered, if we help one another and are decent. The character of the man shall be for us the sole criterion of his worth, not his outward mannerisms and petty idiosyncracies. Many have let themselves be fooled and blinded by such externals for long enough.

The purging of the plants of the influence of the disbanded Party and all its manifestations is one of the first tasks which the new representatives of the employees, who according to valid legal regulations shall be newly elected, will carry out; the election will be conducted justly and strictly in accordance with the regulations issued by the Military Government.

All those who have been employed up to the present, are employed only on a temporary basis, pending the clarification of numerous different problems.

The management and the plant board expect understanding from every individual of all the difficulties which have arisen and which still lie ahead of us. They can best be overcome if peace is preserved within the plant and if every one will feel himself responsible for the reconstruction of the works, i.e. for his very existence. Even directly before the collapse, the National Socialist regime demanded of us that we demolish our plants completely, its propaganda told us that the end of this terrible war could bring only chaos and confusion.

DOCUMENT #URSEER

Doc. No. W 11

Edi. No.

Right now we want to prove and to show that this must not be the case, we want to dedicate all our ability and all our knowledge to building up once more a firm foundation for our own lives and for those of our families.

The more we can and will trust one another, the easier it is going to be.

Let us all set to work together!

For the management :

signed : Dr. Wurster

For the Works Councils :

signed : Lorenz

30 May 1945

Document: WURSTER

Doc. No. 174
Exh. No.

HEADQUARTERS THIRD ARMY
Fort JOHNSON, GEORGIA

13 October 1947

TO WHOM IT MAY CONCERN:

This is to state that Dr. Wurster, head of the I.G. Farben Factory at Ludwigshafen, was very helpful in all possible ways in bringing order out of chaos in the region of the Upper Rhine Valley. He cooperated with the American Military Government at all times.

By manufacturing thousands of tons of fertilizer he caused the production of hundreds of thousands of tons of additional food. This was so very important in both the American and French Zones.

It would be well if Dr. Wurster's ability could be used for the rebuilding of Europe.

signed: Wayland Rhoads

WAYLAND RHODES, Lt. Col., (MC.),
Former Food & Agriculture Officer,
Military Government,
Ludwigshafen

Sworn to and subscribed before me this sixteenth day of February
1948.

signed: Berta E. Smith

BERTA E. SMITH,
Notary Public,
State of Georgia at Large.

My commission expires November 29, 1948

Document: URSTSE

Doc. No. 138
Exh. No.

Telephone: Arizona 3-8470

10517 Eastborne Avenue,
Los Angeles, 24, California,
U.S.A.

1. 12 October 1947

TO WHOM IT MAY CONCERN:

The undersigned John T. Marshall is a Captain in the Officers Reserve Corps, Army of the United States, at this time on inactive duty. I am a veteran of the first and second world wars and served as 1st Lieutenant and later as Captain in the Army of the United States from 29 August 1942 to 23 March 1946.

From about the middle of 1943 to the middle of July, 1945, I was attached to the European Civil Affairs Division of the American Army, later known as U.S. Military Government, in the dual capacity of investigator and intelligence officer for our Chemical Warfare Service and "economic officer" for military government. I served in this capacity in England, France, Belgium and Germany being in liaison with the British Army from January 1944 to November 1944 to study all of their available records and data pertaining to chemical manufacturing and warfare activities in Germany. In February 1945 I made two secret trips into Germany from France penetrating as far as Worms on the first trip and spending two days in Ludwigshafen, Germany the second trip. During these trips I made numerous photographs of bomb damage in railway yards, to bridges, factories, munitions dumps and in other strategic places, and I obtained much information about the activities of

Document UNSUB

Doc. No. 138

~~Doc. No.~~

large industrial plants, power stations, etc. in the area. For this work I later received decorations and the personal commendation of Major General Porter, Chief of Chemical Warfare Service, U.S. Army.

Naturally our chief interest was in I.G. Farbenindustrie, A.G., particularly the Ludwigshafen/Opau plant. Long before we captured Ludwigshafen in March, 1945 we had obtained the dossiers, histories and all pertinent information on all of the more important directors, executives, managers, plant foremen, research heads and representatives. Much of this information was captured before we entered Germany among the files and voluminous records of the former Gauleiter of Saarland which was stored in deep vaults in Strasbourg. We already knew before we crossed into Germany we were the more active, important, and from our point of view "dangerous" members of the N.S.D.A.P., who were merely passive followers and minor functionaries, and we also knew the names and records of a surprisingly large number of persons who were actively anti-Nazi, who had helped Allied Troops escape from Germany or who were in bad repute with the Nazi regime because they were suspected of being disloyal to N.S.D.A.P. We also identified a number of persons in high position in industry who though nominally "Nazis" were really very much against the Party and who gave passive "lip service" to the Party merely to avoid being sent to concentration or other prisons or at the least to avoid losing their positions and properties.

Document URST 51

Doc. No. 138
En. No.

At one time or another after I assumed office as Assistant Military Government Officer in charge of Economics at Ludwigshafen, Germany came to me with denunciations practically every last position holder of prominence in I.G. Farbenindustrie, AG, Gebrüder Giulini, Pfalzwerke, S.D. Kibelwerke, Vereinigte Glaswerke, A.G. Mercedes-Benz, Hülberg Papien & Maschinen Werke (7), etc. etc. According to the volunteer informants anybody whom we in Military Government designated to hold a civil office or to continue in charge of industrial and chemical plants, power plants, water works etc. was a war criminal, a big former Nazi, a regular "little Hitler", a sinister enemy of the Allies and of the German people. All such denunciations were filed along with the data we had in our other files and the Fragebogen which we made every German complete. In nearly every case we found upon investigation that the denunciations were false and were made out of self interest in the hope of winning favor and favors from Military Government or to accomplish revenge or out of jealousy, envy, greed or malice.

You may be very sure that we made most painstaking investigations of such people as Drs. Hurster, Tamm, Rohbeck, Stechl and Cyriax of I.G. Farbenindustrie, AG. before we permitted them to remain in charge of their various activities and

Document LURSTER

Doc. No. 138

Exh. No.

departments in that plant or to be associated with us as employees of Military Government at the Polizeipresidium. I had close daily contact with all of these gentlemen, particularly with Drs. Lurster and Gyriax and I knew them to be honest and honorable, gentlemen upon whose word I could depend and who were in private wholly interested in science, research, chemical production, industry and business and who were absolutely barred politics, Nazism and anything outside of their own purely scientific and managerial work at I.G. Farbenindustrie AG.

To be sure I have been shown pictures of Dr. Lurster sitting on a flag and swastika draped platform in the company of all sorts of Nazi officials and officers, and I have read excerpts of speeches which he made on public occasions, but anything he may have said of a purely general patriotic nature was no more than any man holding such a high position as his was in industry would be obligated to say when in the public eye and to retain that position and if a man can be branded as a "Nazi" for that then every single German who has ever raised his arm in the Nazi salute or greeted another German on the street or signed a letter "Heil Hitler" is equally guilty of being a Nazi. How long would any man in Germany have stayed out of prison, to say nothing of continuing to have held his job, in 1942, 1943, 1944 who refused to give the Nazi salute or to say "Heil Hitler" in greeting to another German? To any American of intelligence these things cut of the past mean nothing. Judge a man by what he is and what he

Document URSTER

Doc. No. 138
Sch. No.

does and how he behaves and we do not hold it against a man that he may have waved a Nazi flag or worn a swastika button or worn a brown or grey uniform if he wore it honorably and was not a war criminal. In that sense, I know that Dr. Furster was never really a Nazi even though he may have had to stand up with the crowd from time to time in public places and give lip service to Hitler and had to carry out orders from higher headquarters of I.G. Farbenindustrie, AG which in turn were transmitted to I.G. Farbenindustrie, AG from the German Government and the Nazi Party.

After Military Government assumed control of the Pfalz Dr. Furster and his associates named above were very co-operative in assisting the American and Allied authorities and every officer who came in contact with them found them to be very helpful in restoring order, rebuilding industry, helping with reconstruction and relief. They did everything we asked them to do and a lot more, and when on the 10th of July 1945 we turned the area over to the French Army and left Ludwigshafen we very much regretted that they would no longer be able to co-operate with us.

Signed: John T. Marshall
JOHN T. MARSHALL,
Captain, Chemical Corps,
(Reserve),

C.918586

AFFIDAVIT.

I, the undersigned Dr. Bernhard Tamm, physicist, born on 29 September 1909 in Pinnberg, residing at Heidelberg, Am Rosenbusch 1, have been duly warned that I shall render myself liable to punishment by making a false affidavit. I declare on oath that my statement is true and was made in order to be submitted as evidence to Military Tribunal No. 6 at the Palace of Justice at Nuremberg/Germany.

I have worked in the Aniline Laboratory of the Badischen Anilin- & Soda Fabrik, Ludwigshafen am Rhein since 1 July 1937. Due to my knowledge of English and French I have been employed as an Associate by the Management of the BASF since the occupation of Ludwigshafen by the American and later by the French troops. For this reason I took part in many discussions with the occupation authorities and was present when the conversation described below took place:

There appeared on 5 July 1937 around 22 hours two officers of the American Military Government Lt. Schwimmer (for financial questions) and Cpt. Schweb (for legal questions) whom we knew from former conferences in the apartment of Dr. Amster in Ludwigshafen/Rhein, Kehlerstr. 16a. They delivered the text of General Order No. 2 by which the property of the I.G. Farbenindustrie Aktiengesellschaft in the American Zone was confiscated and the leading officials dismissed from their positions.

A conversation of nearly 2 hours took place after the note delivered had been studied carefully. This note was discussed in detail and commented on point by point. The two officers declared in the course of this conversation that this General Order should be applied only for the area to be occupied permanently by the American Army according to existing plans. This would not apply to Ludwigshafen, which would be handed over to the French Military Authorities in a few days. The result of this would be that Dr. Mürster would continue to be the responsible head of the I.G. Farbenindustrie-Aktiengesellschaft Plants Ludwigshafen-Opau unless the French Occupation Authorities came to a different decision when they took over. The only limitation on the basis of General Order No. 2 would be that Dr. Mürster should no longer be entitled to dispose of the property and assets existing in the American Zone in its future permanent borders. This would also embrace these assets and goods which were previously under the administration of the Ludwigshafen plant.

Ludwigshafen/Rhein, 9 January 1948

signed Dr. Bernhard Timm

I, F.W. Wagner, Attorney at Law, Ludwigshafen/Rhein, Schloßhauserstrasse 32, herewith attest and certify the above signature of Dr. Bernhard Timm which was appended in my presence.

Ludwigshafen/Rhein, 9 January 1948

signed F. Wagner

Attorney at Law

Copy 1

MILITARY GOVERNMENT - GERMANY
UNITED STATES ZONE

GENERAL ORDER No. 2
(Pursuant to Military Government Law No. 52 - Blocking
and Control of Property)

I.G. FARBEINDUSTRIE A. G.

WHEREAS, it is the main objective of the United Nations to prevent Germany from ever again disrupting the peace of the world;

WHEREAS, I.G. FARBEINDUSTRIE A. G. played a prominent part in building up and maintaining the German war machine;

WHEREAS, through its world-wide cartel system and practices, I.G. FARBEINDUSTRIE A. G., as a deliberate part of Germany's bid for world conquest, hampered the growth of industry and commerce of other nations and weakened their power to defend themselves;

WHEREAS, the war-making power represented by the industries owned or controlled by I.G. FARBEINDUSTRIE A. G. constitutes a major threat to the peace and security of the post-war world so long as such industries remain within the control of Germany; WHEREAS, it is essential to the objectives of the United Nations to take over the direction and control of I.G. FARBEINDUSTRIE A. G. and to seize possession of its property in order to bring about its destruction and the war-making potential which it represents; and

WHEREAS, it is intended that the property seized will be placed at the disposition of the Control Council (Germany), when such action is desired by the Control Council;

IT IS HEREBY ORDERED:

1. All the property within the United States Zone in Germany owned or controlled, directly or indirectly, by I.G. FARBE-INDUSTRIEN A.G., a corporation organized and existing under and by virtue of the laws of Germany with seat and head office at Frankfurt a/M., is hereby specified under paragraph 1 (g) of Military Government Law No. 52 to be subject to seizure of possession, direction, and control by Military Government.
2. The direction and control of I.G. FARBEN-INDUSTRIE A.G. and the possession of all its property in the United States Zone are hereby seized by the Military Governor, United States Zone.
3. Pending the assumption of control of such property by the Control Council, or an agency thereof, all the powers of the Military Governor, United States Zone, with respect to the property seized pursuant hereto and with respect to the direction and control of the corporation are hereby delegated to the Deputy Military Governor, United States Zone. Redellegation of any or all such powers is hereby authorized. In the exercise of such powers, the Deputy Military Governor, United States Zone, or any person acting by or under his authority with respect to the property affected hereby shall not be subject to German law.
4. In the exercise of such powers the Deputy Military Governor, or any person acting by or under his authority with respect to such property, shall be guided by the general objectives stated in the preamble hereto and by the following specific objectives, and will take such measures as he deems appropriate to accomplish them:

- a. The making available to devastated non-enemy countries of Europe and to the United Nations, in accordance with such programs of relief, restitution and reparations as may be decided upon, of any of the property seized under this order and, in particular, of laboratories, plants and equipment which produce chemicals, synthetic Petroleum and rubber, magnesium and aluminium and other non-ferrous metals, iron and steel, machine tools, and heavy machinery;
- b. Destruction of all property seized under this order and not transferred under the provisions of paragraph ^a above if adapted to the production of arms, ammunition, poison gas, explosives, and other implements of war, or any parts, components or ingredients designed for incorporation in the foregoing, and not of a type generally used in industries permitted to operate within Germany;
- c. Dispersion of the ownership and control of such of the plants and equipment seized under this order as have not been transferred or destroyed pursuant to paragraphs a and b above.
5. a. The entire management of I.G. FARBENINDUSTRIE A.G., including but not limited to the supervising board (Aufsichtsrat), the board of directors (Vorstand), and directors (Direktoren) and all other persons, whether office-holders or not, who are empowered, either alone or with others, to bind or sign for or on behalf of I.G. FARBENINDUSTRIE A.G. are forthwith removed and discharged and deprived of all authority to act with respect to the corporation or its property.
- b. The rights of shareholders in respect of selection of management or control of I.G. FARBENINDUSTRIE A.G. are suspended.

Enclosure to Document No. 197

6. Article IV of Military Government Law No. 52 shall not be applicable to any property or enterprise affected by this General Order.

7. This General Order shall become effective on 5 July 1945.

BY ORDER OF MILITARY GOVERNMENT

DOCUMENT WURSTER

Doc. No. 50A

Exh. No.

Copy of a copy

BADISCHE ANILIN-& SODA-FABRIK.

(I.G. Farbenindustrie Aktiengesellschaft "In Dissolution")

The Workers Council

The Workers Council of the BASF

To the

French Administration of
the BASF

L u d w i g s h a f e n

Ludwigshafen a.Rh.

29 April 1947

L/F

Our confidence in the French administration is so great, especially in the case of Dr. Wurster, that we should not have held it to be necessary to take steps in his favor, if we did not think it advisable to point to the extraordinarily successful measures which Dr. Wurster has undertaken in the fields of political and social welfare.

In politics, Dr. Wurster has as far as possible held himself aloof from the Nazi movement. He enabled us to a large degree to develop a democratic spirit within the staff, as this corresponds with the French ideal of freedom.

In the field of social welfare, we owe it to the constant endeavors of Dr. Wurster and of the French authorities that our staff, in its arduous work, still has a tolerable standard of living

DOCUMENT WURSTER
Doc. No. 506
Edh. No.

and that a perfect harmony between workers and employers always prevailed in our plants even though extraordinary demands were made.

The unanimous wish of the working force is that Dr. Wurster should be allowed to return here.

The Workers Council

Signed : Eichberger, Wagner, Lorenz, Fischer, Schaefer,
Weiss, Frenzel, Day, Bauer, Hoffmann, Holzberger,
Koch.

DOCUMENT WURSTER

Doc. No. 507

Exh. No.

B A S F

21 August 1947

To the

Workers of the B A S F

The demonstration which was held yesterday in the afternoon violates the orders of the Occupation Authorities and must not be repeated in any circumstances. It can be excused only on the grounds of its sentimental character.

In order to underline this explanation of its character, it will be necessary to make up for the lost hour.

This will be in the best interests of all concerned, and above all in the interest of Dr. Wurster.

The French Administration
of the B A S F

CERTIFICATE OF TRANSLATION

30 March 1948

We,

Leonard J. LAWRENCE, ETO No. 20138,
Eugene R. MUN, AGO No. D-429798,
Julius J. STEUER, AGO No. A-442654,
Patricia E.C. WOOD, ETO No. 20139,
Beryl C. HESWICK, ETO No. 20183,
Alfred RAHL, No. B-398081,
Phyllis RAY, ETO No. 36287

heroby certify that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of DOCUMENT BOOK 1 - WURSTER.

Leonard J. LAWRENCE
ETO No. 20138,
(pages I-VI)

Eugene R. MUN, AGO No. D-429798,
(pages 1-6, 16-21, 49-51, 54-60,
75-78, 90-92)

Julius J. STEUER,
AGO No. A-442654
(pages 7-15, 30-36)

Patricia E.C. WOOD,
ETO No. 20139,
(pages 22-29)

Beryl C. HESWICK
ETO No. 20183
(pages 52-53)

Alfred RAHL
No. B-398081
(pages 37-48, 61-64, 70-72, 84-85)

Phyllis RAY
ETO No. 36287
(pages 65-69)

Case 6
Defense

Tribunal VI

Case VI

DOCUMENT BOOK II

for

Dr. Carl WURSTER

submitted by
the Defense Counsels

Attorney-at-Law
Friedrich Wilhelm WAGNER

Attorney-at-Law
Dr. Wolfgang HEINTZLER.

- 1 -

Gang



I N D E X

to Document Book II for

Dr. Carl MURSTER Case VI.

Doc. No.	Exh. No.	Contents	Page
----------	----------	----------	------

Count I of Indictment Aggressive War

Preparation for Aggressive War

Preparations for Mobilization in Ludwigshafen/Oppau.

- 16 Map of Western Germany, dimensions: 1:1 000 000 which shows, that the plant Ludwigshafen/Oppau is situated at a distance of about 60 km only from the German-French frontier. (Will be submitted separately in limited numbers). 1
- 140 Affidavit of Dr. Hans MURSTER, dated 20 December 1947. Dr. MURSTER was Foreman of the plant Ludwigshafen until 1940 and worked amongst other things on the so-called Mobilization-questions. He confirms, that at the time before the outbreak of the war the Ludwigshafen/Oppau been in the possession of an obligatory production plan for mobilization: All deliberations of the Berlin-Offices with regard to Ludwigshafen/Oppau were concerned with the question that the plant would not be able to operate in case of war because of its exposed situation near the Western border of the German Reich. All these deliberations were therefore in the opinion of the witness of an exclusively defensive character. 2 - 9
- After taking over the plant management on 1 January 1938, Dr. MURSTER concerned himself only very little with the question of mobilization, had repeatedly defined it as a "paper-war" and had declared that he had to take care of more important matters. The witness describes further the surprise in Ludwigshafen/Oppau which was caused by the telegram of the agency " on 3 September 1939 (Pres.Doc. No. NI-2765, Exh.No.264, Volume IX).
- 158 Affidavit of Dr. Alfred v. NAGEL of 22 December 1947 after the arrival of the telegram of the agency " on 3 September 1939 (Pres.Doc.No.NI-2765, Exh.No. 264, Volume IX, the witness was commissioned to work out a counter-proposal to the "Münchener program" contained therein. The purpose of the counter proposal was to maintain the production volume of Ludwigshafen as far as

Doc.No.	Exh.No.	Contents	Page
---------	---------	----------	------

was possible on the same level as hitherto
in the interest of the maintenance of the
firm and its personnel.

10-11

107

Affidavit of Erich Day of 11 November
1947. The witness is chairman of the
calculation-department of the plant
Ludwigshafen

and member of the works-council since 1945. On the basis of figures he describes the production-process of the more important products of Ludwigshafen during the first 3 quarters of 1939 and the not-production figures for the first 3 quarters of 1939. The figures show a perfectly continuous development without any changes which might point to war preparation during the first 3 quarters of 1939.

12 - 16

The Technical Field of Activity of Dr. MÜSTER, in Particular Sulphuric Acid.

295

Affidavit of Dr. Carl MÜSTER of 31 December 1947. Dr. MÜSTER describes first of all his activity in the field of sulphuric acid within the I.G. and occasionally as honorary advisor to the Office for the Four Year Plan and since 1943/44 within the self-administrative organization of the German Industry. He describes then on the basis of figures the reserved investment policy of the I.G. in the field of sulphuric acid and shows that the I.G. was behind in the entire German development and the world development as far as this field was concerned.

17 - 26

The production of sulphuric acid of the I.G. has been delivered to Non-I.G. plants including the explosives plant of the DAW in decreasing quantities during the period 1932 until 1942 and has been processed to an increasing extent by the I.G. itself. Lastly Dr. MÜSTER describes the channels into which the sulphuric acid production was directed and the rather small percentage of sulphuric acid consumption for the armament sector itself. The development in the field of sulphuric acid does not warrant the conclusion that an aggressive war was intended.

300

Affidavit of Dr. Alfred NAGEL, dated 15 March 1948. The witness confirms that the figures quoted in Document MÜSTER No.295 are correct.

27

603		Excerpt from the minutes of the Sulphur sub-commission conference on 13 January 1937, on the occasion of which Dr. MRSFER reported about the demand for sulphuric acid. Only 6 % of the production of sulphuric acid channelled into the manufacture of explosives, 41 % are used for fertilizers, 14 % for artificial fibres, the rest for the most varying normal chemical productions.	28
-----	--	---	----

576		Excerpt from the minutes of the conference of inorganic Chemists on 23 June 1939 in Leverkusen. The excerpt shows that the balance of sulphuric acid for 1940 gives a deficit of 30 000 tons, whereby the enormous consumption for cellulose wool was pointed out.	29
-----	--	--	----

in particular: Documents for clarification of the
Prosecution-Exhibit 1940.

599		Letter of the Supervisory Board Chemie to the I.G. dated 8 March 1937 with reference to the decree No. 5 of 22 December 1936. The supervisory board forwards the information that the hitherto existing general permit for the I.G. with regard to delivery and own consumption of sulphuric acid is herewith revoked. All consumption and delivery of sulphuric acid will have to be explicitly approved as of now; violations will be punished. It is ordered for March 1937, that the demand for sulphuric acid for the explosives-plant will have to be fully complied with; the same applies to artificial silk and cellulose wool. For the rest the required quantities of acid are to be put at the disposal for the manufacture of export fabrications, on a priority basis.	30-31
-----	--	--	-------

581		Document-notes of the I.G. concerning a discussion in the Reich-Ministry for Economics, of 9 March 1937, present amongst others Dr. MURSTADT. The conference was brought about by the difficulties, which have arisen with regard to the sulphuric acid supply of the I.G. as a result of the order of the supervisory board, Doc. Nr. 599. Amongst other things it is stipulated that the Reichs-ministry for Economics will speedily consider the problem: whether it is possible to curtail, through intervention at the Reichs Ministry of War	32 -34
-----	--	--	--------

Doc.No.	Doc.No.	Contents	Page
		the requirements of the armament industry."	
582		Circular of the Inorganic-Department of the plant Ludwigshafen of 11 March 1937, concerning the sulphuric acid-supply of the I.G. It is stated therein that "in order to fulfill special priority sales-commitments, certain restrictions of hitherto slight extent have been carried out in the I.G. plants."	35 - 37
		"We have mainly curtailed the supply for the plants of the Dynamite-Aktiengesellschaft, since the extensive requirements had not been reported at all on their part."	
		The Dynamite-AG is said to have complained to the supervisory board Chemie for this reason; the complaint had been forwarded to the Army Ordnance Office and had the result that the Supervisory Board Chemie had taken over the control of the Sulphuric acid effective March 1937. "The absurdity of the decree could be proved on the basis of numerous examples."	
583		Letter of Dr. Paul MULLER of the Dynamit. G. to Dr. WUSTER, dated 12 March 1937, contained in rps. Bd. 1940. Dr. MULLER protests against the statements in the circular of 11 March 1937 (Document WUSTER 582).	38 - 40
584		Letter of Dr. WUSTER to Dr. Paul MULLER, dated 13 March 1937 (contained in rps. Bd. 1940) stating his opinion on the letter of Dr. MULLER of 15 March 1937. (Document WUSTER 583).	41 - 42
585		Letter from Dr. MULLER to Dr. WUSTER, dated 15 March 1937. It is stated in the letter that the Dynamite AG had always had the impression, that Dr. WUSTER had curtailed its sulphuric acid supply only to the same extent as that of its other consumers; in actual fact the entire amount of the lacking quantities of sulphuric acid had been obtained by curtailing the plants of the Dynamite A.G.	43
586		Excerpt from the minutes of the 57th conference of the Sulphur-subcommission on 16 March 1937. In Frankfurt/Main, in the course of which the disagreement between the D.G. and the I.G. was settled. The gentlemen of the D.G. admitted, that they had not informed the I.G.	44 - 45

Doc.No.	Doc.No.	Contents	Page
---------	---------	----------	------

about the facts, i.e. with regard to the sulphuric acid requirements of the I.G.
44 - 45

Documents Pertaining to Sulphuric Acid from Gypsum.

- 578 Excerpt from the minutes of the conference of the Chemicals-Committee on 5 July 1933. There is no objection to hand over the Gypsum-sulphuric acid-process to the Russians as far as the interest of the I.G. or the political economic interest of the Nation as a whole are concerned.
46
- 579 Excerpt from the minutes of the conference of the Chemicals-Committee of 4 December 1937. The excerpt shows that the English Chemical Concern ICI is in possession of a sulphuric acid plant, on license by the I.G., and that the French firm is St. Gobain is interested in a Gypsum-sulphuric acid installation.
47
- 580 Excerpt from the 43rd conference of the Chemicals-Committee of 19 April 1938 concerning the establishment of a Gypsum-Sulphuric acid plant in Romania.
48
- 601 Excerpt from the minutes of the Sulphur-subcommission-conference of 26 September 1934. The Sulphur-subcommission is of the opinion that the I.G. is prepared to build a Gypsum-sulphuric acid-plant in Wolfen-Central Germany, if the artificial silk industry should be in need of sulphuric acid.
49 - 50
- 602 Excerpt from the minutes of the combined conference of the Chlorine- and Sulphur-subcommission on 22 April 1936. In view of the increased manufacture of cellulose wool in Wolfen, the necessity of an increase in the output of sulphuric acid of the I.G. in Central Germany of about 30 000 to 40 000 ton year is acknowledged. It must be calculated first of all, whether a gypsum-sulphuric acid plant in Wolfen or a sulphuric acid-plant in Louisa on the basis of sulphide of hydrogen will be more favorable from an economic and technical point of view. A gypsum-sulphuric acid installation would have the advantage of offering the possibility to gain more experiences in this field, the possibility to receive payments for licenses and the thought of negotiations with the contractors of pyrites.

Doc.No.	Doc.No.	Contents	Page
606		Excerpt from the minutes of the Sulphur-subcommission conference on 1 April 1938. At the discussion about the gypsum-sulphuric acid plant Welfen it was noted, that 100 kg sulphuric acid cost RM 3.90 in this plant, whereas sulphuric acid out of pyrite would cost in the same plant RM 4.50 per 100 kg.	53
607		Excerpt from the minutes of the Sulphur-sub-commission conference on 10 April 1939. It was mentioned that a gypsum sulphuric acid plant would be uneconomical in Western Germany, because there the freight-rates for pyrite are favorable.	54
		<u>Storage of Pyrite Reference: Letter of the Reichs Ministry for War to Ludwigshafen, dated 21 December 1937, contained in Prosecution-Exhibit No. 749, Doc. No. NI-3843, Volume 40.</u>	
508		Letter of the plant Ludwigshafen to the Reichs Ministry for War, dated 29 November 1937, pertaining to the supply storage of pyrite. Ludwigshafen requests to refrain from a decree, according to which the supply of pyrite, resulting from the import of the pyrite-surplus from Spain, should be decreased in Ludwigshafen.	55 - 56
600		(From Prosec. Exhibit No. 749, Doc. No. NI-3843, Book 40) Letter from the Reich Ministry for War to Ludwigshafen, of 21 December 1937, in answer to the letter from Ludwigshafen, Document "UNSTER 508.	57 - 58
538 558		Document note of the central Finance Administration of the I.G. dated 26 July 1937, pertaining to the import of pyrite from White-Spain. Over a period of 2 1/2 years ca. 1,2 million tons of pyrite are to be imported per year, which will mean a considerable supply in storage, considering the yearly requirement of 700,000 tons. "On the part of the German official authorities stress is laid on a maximum import of pyrite, in order to affect in this manner a quicker payment for the German products which have already been exported."	59 - 61
560		Document file Dr. UNSTER of 12 July 1937, pertaining to the additional storing of pyrite. "The affected storage of supplies is to	

Doc.No.	Exh.No.	Contents	Page
		be decreased in 5 years, by signing agreements in the future for 40 000 tons of pyrite only."	62 - 63
575		Excerpt from the minutes of the conference of inorganic chemistry experts on 30 June 1939 in Leverkusen. "The pyrite supplies of the I.G. have shrunk to about half a years supply."	64
579		Excerpt from the 48th conference of the Chemical Committee on 4 December 1937. The excerpt shows that 1937 brought about deliberations of the French Chemical firms with regard to securing the import of pyrite for the duration of the Spanish civil war.	65
		<u>Examples of Technical Co-operation with Foreign Countries in 1939.</u>	
574		Excerpt from the I&C-gathering on 25 January 1939. "In the inorganic field a certain collaboration with the French firm St.Gobain seems to be forthcoming."	66
577		Excerpt from the minutes of the Inorganic Chemists-meeting on 5 April 1939. Dr. WURSTER reports that "the negotiations with St.Gobain are hopeful, despite present political difficulties."	67
		<u>Documents Pertaining to the Activity of Dr. WURSTER in the Field of Sulphuric acid Outside the I.G.</u>	
501		Official appointment on 28 January 1944 of Dr. WURSTER, who has been entrusted with the direction of the branch-group Sulphur and Sulphur Compounds in the industrial group Chemical Industry.	68
243		Affidavit of Hermann SCHUSTER, dated 27 January 1948, who has been business manager and secretary of the branch group Sulphur and Sulphur Compounds in the industrial group of the Chemical Industry. He confirms that Dr. WURSTER was appointed officially only at the beginning of April 1944, to be director of the branch group which was founded in 1943. Dr. WURSTER has held only 2 meetings of the branch group until the end of the war and has carried out his function purely objectively and definitely unpolitically. Dr. WURSTER was never "Expert deputy of the branch group GB Chemie."	69 - 71

Doc. No.	Sch.No.	Contents	Page
194		Affidavit of Dr. FOHLMEYER, dated 2 January 1948. The witness has been referent of the GB Chemie from 1937 until 1943. He confirms that Dr. MÜSTER never had any other function than that of an honorary advisor without authoritative power or power of making decisions whilst with the Reichs Office for Economic Expansion, that is to say, the GB Chemie. Dr. MÜSTER did not carry out any activity in the capacity of a special deputy of the GB Chemie.	72 - 73
502		Excerpt from the circular of the Industrial Group Chemical Industry of November 1944, which proves that Dr. MÜSTER was not a member of the presidium of the Industrial Group Chemical Industry.	74 - 75
177		Affidavit of Dr. Hermann SCHLESING, dated 23 September 1947. The witness was chairman of the presidium of the industrial group Chemical Industry and confirms that Dr. MÜSTER had never been a member of the presidium.	76
		<u>With reference to Pres. Doc. HI-5773, Exhibit 1028, Volume 50.</u>	
147		Affidavit of Hans MAGGHELIEN of 15 December 1947. The witness was private secretary to Dr. MÜSTER. He declares that Dr. MÜSTER did not know what to do with the letter of Dr. MATTES (Pres. Doc. 1028). He therefore did not deal with the letter nor did he answer it but forwarded it to the central finance administration of the I.G. which was competent for financial matters.	77 - 78
		<u>Count II of the Indictment Robbery and Plunder.</u>	
170		Affidavit of Dr. Erich FOHLMEYER dated 28 October 1947. The witness worked in the Reichs Office for Economic Expansion during the period 1939 / 1945. At the bidding of the Reichs Ministry for Economics he went on an inspection-tour to Poland and asked Dr. MÜSTER to accompany him, in his capacity as an expert.	79 - 82

Doc. No.	Sch. No.	Contents	Page
		The witness never received the draft of the notes of Dr. WURSTER, Pres. Doc. NI-1149, Sch. 1134, Vol. 55 nor a corresponding report of Dr. WURSTER. The journey did not have any actual results, because the administration of the occupied areas had been transferred about this time to the Governor General who was under the immediate supervision of HITLER, with the result, that the Reichs Ministry for Economics, that is to say, the Reichs Office for Economic Expansion, were excluded from the administration of the occupied territories. Polish	79 - 82
609		Affidavit of Dr. BOTO MLENI, dated 20 March 1948. The witness was director of the Chemistry Department in the Reichs Ministry of Economics from 1938 until 1944 and is at present active in the Bizonal Economic Administration. He declares that he would have been bound to know, if a report concerning the journey to Poland had been forwarded to his office. Such a report had in fact not been received.	83 - 84
127		Affidavit of Dr. Kurt HUBER, dated 21 November 1947. Dr. HUBER accompanied Dr. POHLAND on his journey to Poland - 1939 - in the capacity of an interpreter, when Dr. WURSTER also took part as technical expert. He records that Dr. WURSTER had great pity for the unhappy country of Poland; he therefore had demanded that the population should be treated politely and with consideration. He describes the manner in which Dr. WURSTER had expressed himself against antisemitism and that he had actually favored Dr. POTENSKI, the Jewish, director of an artificial silk factory, during the negotiations there.	85 - 88
311		Affidavit of Dr. Althor BEKER of 19 March 1948. The witness was business manager of the Economic Chamber in Saarbruecken from 1941 until 1945 and during the period June to December 1940 in the office of the Chief of the Civilian Administration in Metz. He remembers the negotiations at that time concerning the oxygen installation Diedenhofen.	

Doc. No.	Exh. No.	Contents	Page
----------	----------	----------	------

and known for certain that Dr. UNSTER did not participate in the negotiations concerning the lease of this plant.

The witness also knows that, Dr. UNSTER had been very much against the purchase of a French Chemical factory by the I.G. in 1940, which was desired by the Chief of the civilian administration in Lorraine.

89 - 90

This is to certify that all the documents
contained in this document book are true
and correct copies of the originals.

Dr. Wolfgang HEINTZELER
Attorney-at-Law

Document Book II TURSTER
Document TURSTER No. 16
Exhibit No.

A map of western Germany on the scale
of 1:1000000, which shows that the
Werk Ludwigshafen/Oppau is located at
a distance of only approx. 60 km from the
German - French frontier.

(This is being submitted in limited
numbers and separately)

Copy

Affidavit

I, the undersigned Dr. Hans EMMER, resident in Heidelberg,
Königsplatz 11, was warned that I render myself liable
to punishment if I make a false affidavit. I declare under
oath that my statement corresponds to the truth and was made
in order to be submitted as evidence to the Military Tribunal
in the Palace of Justice, Marburg, Germany.

On 1 April 1902 I entered into employment with the then
Badische Aniline & Soda factory in Ludwigshafen on the
Rhine, as a chemist, I was active in the Werk Ludwigshafen -
at the end as Prokurist of the I. G. Farbenindustrie A.G. -
until 31 January 1940. Since that time I have been retired.
In the last years of my activity my sphere of work consisted
of helping the works management in general administrative
matters. This sphere of work also included, among other
things, dealing with the so-called Mob questions. In this
connection I can state the following to the best of my knowledge
and belief on the basis of my personal memory as well as
on the basis of written records in so far as these are still
at my disposal at the present time.

(page 2 of original)

1. Concerning the period from the beginning of 1937 until

26 August 1939.

As far as I remember, the work in the field of Vob preparations reaches back to the first months of the year 1937. At that time all Industrial factories were divided into two categories by the Reich authorities; they were divided into absolute armament concerns which were subordinated to the competent Wehrmacht agencies (armament command or armament inspection) and into the so-called KL concerns which were subordinated to the Reich economic ministry. The Werk Ludwigshafen was declared to be a KL concern by the Reich authorities. The Reich Economic Ministry made the individual economic groups, which belonged to the Reich group Industry, responsible for the carrying out of the economic Vob preparations with regard to the KL concerns, so that in this respect Ludwigshafen was subordinated to the economic group chemical industry. At the beginning of 1937 every industrial concern was instructed to name a so-called confidential agent and a deputy to that agent to the pertinent economic group. I was named as confidential agent for the Werk Ludwigshafen and Herr Dr. MOLL was named as my deputy. In this capacity I corresponded with the competent agencies and together with my deputy, Herr Dr. MOLL, I also occasionally participated in discussions in Berlin or elsewhere.

(page 3 of original)

I always considered the entire work in the field of Mob questions as a mere preparation for a defensive war which might be forced upon us. The main theme during discussions with official agencies was also always that anything other than a defensive war would naturally not come into question as far as Germany was concerned. I believed these statements all the more since I was absolutely convinced that, if only for reasons of production possibilities and raw material supplies, Germany would never be in a position to lead an aggressive war successfully.

During the entire period from the beginning of 1937 until the outbreak of war, the competent authorities did not at any time establish a compulsory Mob production program for the Werk Ludwigshafen/Oppau. A so-called man-power allocation scheme (Belegungsplan) had to be set up for the concern, as in the case of every other industrial concern in Germany at that time, but this scheme was at first worked out by us in such a manner that to all intents and purposes it ensured continuation of the normal production possibilities.

Since the Berlin authorities were of the opinion that due to the exposed location (right on the western frontier of the Reich) of Ludwigshafen/Oppau, that concern would not be able to maintain production in the event of war

(page 4 of original)

a so-called evacuation plan was drawn up for Ludwigshafen/Oppeu in fall 1938; in the first instance this plan stipulated the removal of important finished products, unfinished products and raw materials as well as the removal of several production installations.

All these plans and measures which concerned the Werk Ludwigshafen/Oppeu were of absolutely defensive nature and did not in any way arouse in us the idea of the possibility of an aggressive war.

Since, as mentioned before, the Berlin authorities considered the Werk Ludwigshafen/Oppeu to be in an especially dangerous position in view of its proximity to the Franco-German frontier, any form of expansion of the plant was finally declared to be undesirable and from about the middle of 1939 onwards the Berlin authorities demanded that they be informed of any further expansion of the plant in order to be able to oppose it. . . Finally, at about the middle of 1939, the Berlin authorities expressed the wish that parts of the production installations of the Werk Ludwigshafen/Oppeu be moved into the Confrat-German area which was considered to be safe; this wish, however, was not granted.

Up to the end of 1937, I was subordinated to the then works manager Direktor Dr. GUS with regard to dealing with labor matters. On 1 January 1938

(page 5 of original)

Herr Dr. WURSTER and Herr Dr. MEROS took over the technical management of the Ludwigshafen works, simultaneously to their being nominated as members of the Vorstand. During the entire period before the war the members of the works management only took very little interest in this sphere; Herr Dr. WURSTER in particular, whom I had to keep informed about these matters, considered all this work as superficial paper work and repeatedly described it as a "paper war". It happened repeatedly that, upon my wanting to report to Dr. WURSTER about these matters, he stated that he had no time for it and that he had more important things to take care of. The reason for this attitude was that Herr Dr. WURSTER considered the condition on which the entire HOB project was based, i.e. the outbreak of a war, as purely theoretical. As revealed during many discussions he was absolutely convinced that another war in Europe would not only mean the end of Germany but also the end of virtually the whole of Europe; that is why he did not as much as consider the possibility of such a war seriously. This opinion was also the reason why Herr Dr. WURSTER did not comply with the wishes which were expressed on the part of the Berlin authorities even before the outbreak of war, to remove production installations from Ludwigshafen/Oppau to central Germany.

(page 5 of original)

II. Concerning the period after 26 August 1939.

The statements under I, reveal that, at no time before the outbreak of war, did the Werk Ludwigs-hafen/Oppau have any binding Mob production plan. As a result of this, it is also quite impossible that the Werk Ludwigs-hafen/Oppau was already converted to Mob production at any time prior to the outbreak of war. I can state with absolute certainty that during the first 8 months of the year 1939, and for quite some time beyond that, the production of the Werk Ludwigs-hafen/Oppau was absolutely normal, to all intents and purposes. The Reich Economic Ministry (Reich plenipotentiary for Chemistry) first sent the draft of a Mob task to the Werk Ludwigs-hafen/Oppau for action on the part of the latter and requesting the latter's opinion on it, by means of the letter of 26 August 1939 which arrived at Ludwigs-hafen at 2300 hours on 27 August 1939. This draft was drawn up by the Reich Economic Ministry without the latter having consulted the Werk Ludwigs-hafen/Oppau about it. I am attaching to this affidavit, as an enclosure, a photostat of that letter which is in my personal possession. I offer absolute assurance that a discussion about a concrete Mob production task on the part of the Werk Ludwigs-hafen/Oppau was started for the first time as a result of this letter. The enclosures of the letter of 26 August 1939 are no longer in my possession. I remember exactly that the Mob program which was put up for discussion seemed absolutely impossible to me and to the members of the works management Ludwigs-hafen/Oppau on the basis of technical and social reasons.

(page 7 of original)

We were therefore convinced that the program suggested by the Reich Economic Ministry needed to be fundamentally revised. The revising itself, however, was dealt with dilatorily, in accordance with the attitude taken by us hitherto in connection with these matters.

After the outbreak of war between the Western powers and Germany on 3 September 1939 in the afternoon, a telegram from the Vermittlungsstelle (Mediating office W) arrived at Ludwigshafen; according to this telegram the "recently established minimum program" was to be put into action immediately at Ludwigshafen/Oppau with still amendments and the labor reserves resulting from this were to be kept in readiness for utilization elsewhere within the I.G. The "recently established minimum program" mentioned in the telegram was the production program which had been sent to the Werk Ludwigshafen/Oppau in the letter of the Reich Economic Ministry of 25 August 1939 for action on the part of the concern and with the request that the latter voice opinions on it. Since we considered the last program for technical and social reasons, as totally impossible, as already mentioned, we were completely taken by surprise by the Reich Economic Ministry's instructions contained in the telegram from the Vermittlungsstelle W of 3 September 1939. The telegram also caused considerable nervousness on our part because up to that time

(page 3 of original)

we had not even started to take action in connection with the letter from the Reich Economic Ministry of 26 August 1939. On 3 September 1939, therefore, Herr Dr. von NAGEL, who had returned from a vacation on that day, was commissioned to review the minimal program and to draft a counter proposal. This counter proposal was sent to the Reich Economic Ministry in the letter of 9 September 1939. As far as I remember, Herr Dr. TURSTER thereupon discussed the counter proposals contained in our letter of 9 September 1939 with the competent agencies in Berlin. As far as I remember, this was the first time that Herr Dr. TURSTER took a personal part in connection with Noh matters.

Ludwigshafen on the Rhine, 20

December 1947

signed: Dr. Hans MEHNER

Encl.

The above signature of Herr Dr. Hans MEHNER, resident in Heidelberg, Meckenhofstr. 11, which was executed before me, Dr. Wolfgang HEINTZELER, Ludwigshafen on the Rhine, Bruckstrasse 13, is hereby certified and witnessed by me.

Ludwigshafen on the Rhine, 20 December 1947

signed: Dr. Wolfgang HEINTZELER

Attorney-at-Law.

Photostat

The Reich and Prussian
Minister for Economy

Berlin, 26 August 1939
Dr. Hgt/Tai

All enquiries correspondence
referring to the forms etc.
to be addressed to:

The Reich Plenipotentiary for
Chemistry
Herr Dr. Claus Uggewitter
or deputy
Berlin W 35, Sigismundstr. 6

Secret

1. This is a State secret pursuant to para. 88 RStGB
2. If sent by post only to be forwarded in a sealed envelope marked "registered"
3. To be kept in safe custody by the recipient.

Firm I.G. Farbenindustrie A.G. Berlin W 7,
Unter den Linden 82

Plant Oppau and Ludwigshafen

attention Herr Dir. Dr. M o h n e r (person responsible
for processing).

In the enclosure please find five copies (2 white, 1 each in yellow blue and pink) of the mobilization project (Form I) assigned to your plant mentioned above. 8 Forms of the same corresponding color are attached (forms 2-9) to each copy.

The mobilization project serves the purpose of giving detailed instructions to each plant concerning the production program to be carried out in the event of mobilization. Under the heading "Mobilization Calendar" (form 9) a schedule of the measures to be adopted in carrying out the mobilization project in the event of mobilization is to be found.

If the mobilization project shown on form I does not seem practicable in view of technical installations available; the above-mentioned office should be contacted immediately re clarification on the matter. Correspondence should be forwarded in duplicate.

Further processing of the mobilization project is to be done by filling in the enclosed forms accordingly (forms 2-9); directives for the processing of each individual form - if necessary, are to be found on the reverse side. The above-mentioned office will supply information upon any points which require clarification.

In addition, the mobilization project represents the basis for cooperation with the responsible branch office of the Reich Ministry for Economy, with regard to the acquisition of essential personnel, particularly skilled workers indispensable in the event of mobilization.

(page 9a of original)
cont.

Form 1-9 will be completed in quadruplicate (1 each in white, yellow, blue, pink) and forwarded for examination to the above-mentioned office. If the space allotted on each form is not sufficient for the information

(page 9b of original)

required, the above office will forward additional forms. Small letters should be used when referring to the forms enclosed (e.g. form 2a). At first a white copy will be retained as a draft by the person responsible for processing. After eliminating any possible discrepancies in the processing, the plant will receive one copy (white) of the final mobilization project, in exchange for the draft retained in the plant. This will consist of forms 1-9 clipped together, inside a cover which will bear an official mark of approval.

Care should be taken that it is kept in safe custody in a safe to avoid any unauthorized appropriation. The person competent for the processing of the mobilization project is responsible for its safe-keeping.

by order,
Godlewski.

Enclosures 99

Within 6 days of receipt of this letter, forms 2-4 and 6-9 should be completed in all parts and returned to me; raw materials are to be stated separately under each item of form I.

CERTIFICATE OF TRANSLATION

23 April 1948

I, Flora C. Gottschalk, Civ. No. 20094, herewith certify that I am a duly appointed translator for the German and English languages and that the above is a true and correct translation of the document Furster No. 140 Volume II.

FLORA C. GOTTSCHALK
Civ. No. 20094

Copy.

A f f i d a v i t.

I, the undersigned Dr. Alfred von NIGEL, born on 13 August 1903, resident in Ludwigshafen on the Rhine, Albrechtstrasse 8, was first of all warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement corresponds to the truth and was made in order to be submitted as evidence to the Military Tribunal in the Palace of Justice, Nuremberg, Germany.

I entered employment as a chemist with the I.G. Farbenindustrie Aktiengesellschaft Ludwigshafen on the Rhine, on 1 January 1927. At first I worked there in the field of inorganic chemistry. I came into contact with mobilization questions for the first time on 3 September 1939, in the following manner:

On 3 September 1939 I returned to Ludwigshafen from my summer vacation in the Alps during which I had been surprised by the outbreak of war. In Ludwigshafen I reported my return to Herr Dr. JURSTER. On this occasion he informed me of the following:

On 27 August 1939 the works had received a letter from the Reich Economic Ministry, dated 25 August 1939; this letter contained a draft for a mobilization plan for action and comments by the works. On 3 September 1939, shortly before my arrival at Herr JURSTER's, the works had received a telegram from the Vermittlungsstelle W (Mediation office W) according to which Ludwigshafen/Oppau was to put into action immediately

(Page 2 of original)

the "minimum program" which was contained as a draft in the letter from the Reich Economic Ministry of 26 August 1939. In addition, Herr Dr. TURSTER told me that this "minimum program" was totally impossible for technical and social reasons. In accordance with the hitherto customary dilatory manner of dealing with the paper-war in the field of mobilization, the letter of 26 August 1939 from the Reich Economic Ministry had not been dealt with up to 3 September 1939; in view of this and with regard to the telegram from the Vermittlungsstelle 3, Herr Dr. TURSTER ordered me to work out as quickly as possible a technically sensible counter proposal to the letter of 26 August 1939, in accordance with the guiding principles voiced by Dr. TURSTER. I carried out this order and on 9 September 1939 the written counter proposal worked out by me was sent to the Reich Economic Ministry. This counter proposal remained the basis of all further discussions about future production of the Werk Ludwigshafen and, as far as I know, this counter proposal was termed the "TURSTER program" by the participating Reich authorities. The object of the program was to retain, insofar as was in any way possible, the existing production volume of Ludwigshafen in the interest of maintaining the concern and its staff.

Ludwigshafen on the Rhine, 22 December 1947

signed: Dr. Alfred von NIGEL

The above signature of Herr Dr. Alfred NIGEL, resident in Ludwigshafen on the Rhine, Volframstrasse 8, which was given before me, Dr. Wolfgang HEINTZEL, Ludwigshafen on the Rhine, Brunckstrasse 13, is hereby certified and attested to.

Ludwigshafen on the Rhine, 22 December 1947.

signed: Dr. Wolfgang HEINTZEL
Attorney-at-Law.

Copy.

A f f i d a v i t .

I, the undersigned Erich D'Y, born on 23 January 1894, resident in Lingenfeld, Altspoyersstrasse 7, was first of all warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement corresponds to the truth and was made in order to be submitted as evidence to the Military Tribunal, Case 6, in the Palace of Justice, Nurnberg, Germany.

On 1 January 1922 I entered into employment, as a commercial clerk, with the then Badische Anilin and Soda factory. Since that time I have worked uninterruptedly in the accounting department of the Werk Ludwigshafen of the subsequently formed I.G. Farbenindustrie Aktiengesellschaft, my first position was that of chief of the calculation department. Since 1945 I have been, in addition to this, a member of the Works council (Betriebsrat) of the Werk Ludwigshafen (now once more Badische Anilin and Soda factory).

On the basis of the records of the calculation department of the Werk Ludwigshafen which are at my disposal I have drawn up the herewith attached table (Enclosure I) "Production development of the more important products of Ludwigshafen-Oppau during the first three quarters of the year 1939", I declare that the figures contained in the attached table (Enclosure I) are correct and complete.

In the herewith attached table (Enclosure II) I have compiled the net production costs of the Werk Ludwigshafen

(page 2 of original)

for the first three quarters of the year 1939. In this connection I declare that these figures are also compiled correctly and completely from the records of the calculation department of the Werk Ludwigs-
hafen. As shown by table II, only very small differences exist between the net production costs of the Werk Ludwigs-
hafen during the first three quarters of the year 1939.

Ludwigshafen on the Rhine, 11 November 1947.

signed: Erich DAY

The above signature of Herr Erich DAY, resident in Lin-enfeld, Utepyerstrasse 7, which was given before me, Dr. Wolfgang HEIMZELER, Ludwigshafen on the Rhine, Bruckstrasse 13, is herewith certified and attested to me.

Ludwigshafen on the Rhine, 11 November 1947.

signed: Dr. Wolfgang HEIMZELER
Attorney-at-Law.

Indv.

Enclosure I

Badische Anilin and Soda Factory
Ludwigshafen on the Rhine
Calculation No 15

Production Development of the more important Products
of Ludwigshafen/Oppau during the first 3 quarters of
the Year 1939.

<u>Product</u>	<u>I/39</u> <u>to</u>	<u>II/39</u> <u>to</u>	<u>III/39</u> <u>to</u>
30 ₃ in contact acid (North) ("Kontaktsäure")	36.117,2	37.062,4	33.704,5
30 ₃ in contact acid (South)	6.557,1	6.429,0	6.301,2
30 ₃ in calcining process (South) (lost)	3.860,1	4.035,3	3.970,2
Blankit (hydrosulfite)	2.152,5	2.427,2 ⁺	2.391,5
Sodium bisulfite solid	2.472,4	2.242,3	2.397,7
Dehydrated sodium sulfite from sodium bisulfite, solid	3.296,5	2.909,8	3.183,6
Liquid sulphurous acid	4.191,2	4.535,6 ⁰	5.007,7
"Zellenschlor" (cell chlorine)	7.556,0	7.427,5	7.337,0
Sodium hydroxide (NaOH) 100% in electrolyte bath	8.705,6	8.458,2	8.343,4
Aluminum chloride K containing iron	1.876,2	1.540,7	1.463,1
Sodium cyanide 100% in solution	1.527,8	1.553,5	1.504,4
Hydrogen, dense S	104,3	106,6	104,9
Phthalocyanhydride pure	1.275,0	1.231,9	1.344,5
Formaldehyde 30 weight %	7.096,6	7.506,6	8.257,5
1,4-ethyleneglycol approx. 100 %	518,1	535,7	533,2
Acryloxyethyl ester approx. 100 %	139,8	234,1	237,3

⁺ Increased orders from abroad, especially from overseas.

⁰ Increase mainly due to increased orders from abroad for Blankit.

(page 2 of original)

Product	I/39 to	II/39 to	III/39 to
Acrylnic acid methylester approx. 100 %	89,8	87,5	142,6
Ethylbenzol approx. 100 %	1 377,5	1 127,7	1 135,0
Styrol approx. 100 %	989,8	841,0	854,4
Palatinol O approx. 100 %	284,2	323,4	288,3
Diglycol approx. 100%	169,5	185,4	50,1
Glycerine D	385,3	237,4	231,3
Icolit MF type A, M, E	196,8	166,3	233,5
Butanol H approx. 100%	1 881,6	1 926,3	2 344,5
Penta-Erythrit M	166,0	207,3	181,1
lase VF 500	210,0	215,1	205,6
Chlorbenzol	165,4	124,2	132,9
Nitrogen (N ₂) in li- quid ammonia hydro- xide	15 723,0	13 792,3	14 232,4
Nitrogen (N ₂) in ammonium hydroxide in a gaseous state	32 423,7	36,073,6	23 313,3
Nitric acid concen- trated	8 343,7	9 453,5	8 532,3
Kaurit glue W liquid (water resistant)	1 733,1	1 532,7	2 039,0
Gasoline (Benzin)	75,3	39,6	39,4
solid paraffine	56,5	72,4	99,2
Lubricating oil I - III	821,0	430,3	637,3

Ludwigshafen on the Rhine, 11 November 1947.

signed: Erich D'Y

Document Book II TURSTER
TURSTER Doc. No. 107
Exh. No.

Copy.

Enclosure II

Badische Millin & Soda Factory
Ludwigshafen on the Rhine
Calculation Lu 15

Net Production Costs of the Werk Ludwigshafen during
the first 3 quarters of 1939.

<u>Quarter I 1939</u>	<u>Quarter II 1939</u>	<u>Quarter III 1939</u>
RM 27 012 033.- =====	RM 27 704 373.- =====	RM 23 645 000.- =====

Ludwigshafen on the Rhine, 11 November 1947.

signed: Erich D'Y .

Affidavit

(concerning sulphuric acid)

I, the undersigned Dr. Carl FURSTER, residing in Ludwigshafen on Rhine, Wechlerstrasse 16a, at present in the prison of the Military Tribunal Nurnberg, having been warned that I render myself liable to punishment if I make a false affidavit do hereby declare on oath that my statements are the full truth and were made to be submitted as evidence in Military Tribunal No. 6 in the Palace of Justice at Nurnberg, Germany.

1. My activity in the sphere of sulphuric acid.

- 1.) At the end of 1931, when I was appointed deputy manager of the inorganic department of the Ludwigshafen plant of which I was the permanent manager as from 1934, I also took charge of the Ludwigshafen sulphuric acid plant. The production of sulphuric acid after the so-called contact process is based on an invention of the man preceding my predecessor Dr. KNIETSCH. This invention ranks high among the great pioneering feats in chemistry. Millions of tons of sulphuric acid are being produced today all over the world after the process evolved by KNIETSCH in the Badische Anilin- & Soda- Fabrik, Ludwigshafen a. Rhein. Prior to KNIETSCH's invention, sulphuric acid was mainly produced by calcining in the presence of air a mineral containing 40 - 50 % of sulphur, the so-called pyrites, and subsequently oxydizing the calcination gases into sulphuric acid by means of nitric gases. The result was a compound containing about 60 % of sulphuric acid which could be transformed into

(page 1 of original, cont'd.)

concentrated sulphuric acid only by a special evaporating process. After KNITSCH's invention the oxydation of the calcination gases in the presence of air is effected by the introduction of a contact (Katalysator), producing in one operation a highly concentrated, very pure sulphuric acid. It was on the basis of this process that the first contact sulphuric acid plant in the world was set up in Ludwigshafen.

(page 2 of original)

at that time the product turned out by this plant was one of the technical prerequisites for the production of synthetic Indigo.

- 2.) To deal with the important product sulphuric acid and some of its derivatives there existed, since the constitution of the I.G. in 1925 a special sub-committee (called sulphur-Uko) the chairmanship of which had for many years been held by Ludwigshafen. For a time the chair was held by Hoechst. Soon after I had been delegated into this committee, however, the chairmanship again devolved upon me and, consequently, on Ludwigshafen. (1934). That was plausible, considering that, prior to the fusion into the I.G., the sulphuric acid factories of the various I.G. plants had been constituted as licensed enterprises operated on the above outlined KNITSCHE process of the Badische Anilin- & Soda- Fabrik. It was therefore, so to speak a traditional obligation that Ludwigshafen should again take the lead in this field.
- 3.) After Professor KRAUCH had been entrusted with the chemical production scheme in the Four Years Plan Office, it was natural that his office should occasionally consult with me in matters connected with sulphuric acid, as it did with many other experts of the German chemical industry in their particular fields. When an opinion was required on drafts of inventions which came within my sphere or when the expansion or the rebuilding of sulphuric acid plants in Germany was under discussion, KRAUCH's office would occasionally ask for my expert advice regarding say the raw material

(page 2 of original, cont'd.)

basis on the technical processes on which to build most advantageously. A special problem in this connection was the extraction of sulphuric acid from sulphuric exhaust gases in metal smelting works (zinc, lead and copper smelting works) which in Germany, in contrast, for instance, to the U.S.A., were mostly allowed to go to waste, contaminating the air and doing damage to agriculture and forestry.

- 4.) It was not until after the middle of 1943 that I was given an assignment - again in the particular sphere of sulphuric acid chemistry - within the self-administrative organization of the German industry, and in 1944 I was charged with the management of the sub-section for sulphuric acid chemistry within the Economy Group "Chemical Industry", in very much the same way as many other technicians of the various chemical companies in Germany took

(page 3 of original)

charge of sub-sections in their particular fields. However this activity no longer assumed any appreciable proportions, if only because the air war and my increased responsibilities ~~for the Ludwigshafen plant~~ and its staff which it involved made a practically complete concentration on my managerial function in this plant imperative.

II. The development of the sulphuric acid sector.

Owing to my functions as chief of the Inorganic Section of the Ludwigshafen plant (1934) and chairman of the Sulphur-Uke (1934) and, to a lesser degree, also owing to my occasional and honorary function as advisor to KRAUCH's office and my activity as chief of the sub-section sulphur and sulphates in the Economy Group Chemical Industry (since 1943/44) I am familiar with the facts mentioned herein after under paragraphs 1 to 6. These facts are intended to corroborate that it was not possible to infer from the development of the sulphuric acid sector within the I.G. and in Germany at large in the years after 1939 that the German government intended to wage aggressive wars.

- 1.) In the sulphuric acid sector the I.G. pursued the most careful and conservative investment policy, which is proven, by the fact, for instance, that the production of the I.G. increased at a much slower rate than that of the rest of Germany and, above all, of the rest of the world. Conditions are well illustrated by a small tabular summary. Putting the sulphuric acid production of 1929, expressed in tons of SO_3 , at 100%, the following figures result:

SO_3 production in million tons.

	<u>1929</u>	<u>1937</u>
World at large	11,4 = 100 %	14,9 = 131%
Overseas	5,3 = 100 %	7,6 = 144%
Europe	6,1 = 100%	7,3 = 120%
Germany	1,39 = 100%	1,63 = 121%
I.G.	0,572 = 100%	0,591 = 103%

It is evident, then, that the I.G. production in the period under survey

(page 4 of original)

rose only by 3%, whereas the German production rose by 21%, world production by 31% and the production other than European even by 44%. It remains to be examined, therefore, whether the I.G. made up for this lag in the following two years preceding the outbreak of war. The answer is no. The following figures may be quoted in evidence, the percentages again referring to 1923 = 100 %:

SO₃ production in million tons.

	<u>1938</u>	<u>1939</u>
Germany	1,05 = 133 %	1,95 = 141 %
I.G.	0,645 = 113 %	0,745 = 130 %

It is obvious, then that while the I.G. did participate in the progressive development it again lagged behind the production of Germany as a whole. Nor has it come up with the world development reached two years previously, let alone that it got anywhere near the overseas development reached already two years previously. The fact is that the investment policy of the I.G. aimed at technically improving the plants and reequipping the production, to a moderate extent at least, to the raw materials available on the spot such as gaseous sulphur and gypsum, rather than at expanding the production. This was the reason underlying the utilization of the gaseous sulphur in Leuna and the erection of the gypsum sulphuric acid plant in Solfa.

- 2.) The production development of the I.G. was exclusively determined by the need for meeting the own requirements, and in adhering to this principle care was taken to supply also the old clientèle with a certain quantity of acid. In the years 1932 to 1942, however, the proportion available for supplies to non-I.G. plants including the powder and explosive producing industry dropped from 41,0 to 13,9 %, as shown in the following table:

Progressive development of the ratio between own use
and supplies to companies outside the I.G. in 1932-1940.

Year	Own use of the I.G. in percent- ages of the I.G. production	I.G. supplies to non-I.G. plants including the explo- sive plants, in particular the Dynamit A.G. in percent- ages of the production
1932	53,1	41,9
1933	59,0	41,0
1934	62,3	37,2
1935	66,1	33,9
1936	69,5	30,5
1937	79,5	20,6
1938	74,7	25,3
1939	71,5	28,5
1940	72,1	27,9
1941	73,1	26,9
1942	81,1	18,9

Already prior to, but all the more so during the
for the Reich Office (Reichsstelle) Chemistry and the
Reich Ministry of Economic Affairs frequently blamed
us for this sharp decline of the proportion of the
I.G. production available for supply to the non-I.G.
plants including the explosive factories. Is a matter
of fact, - even basing the comparison, not on a year
of depression as 1932, but on a normal year like 1936,
the I.G. never again either before or during the war
reached the 1936 percentage of 30,5 for sale and ex-
plosives production, which is proven by the above
figures.

- 3.) That the production of sulphuric acid in Germany in-
creased at all was a development typical of the whole
world. It was conditioned by the general tendency of
economy to concentrate on chemical production (Chemie-
isierung der Wirtschaft) and in this development the in-
creasing production of nitrous and phosphorous ferti-
lizers played a decisive part, as sulphuric acid is

required for their manufacture. The effect of this increase, the world over and in highly industrialized countries as for instance in U.S.A. and Germany, viewed over a period of some length is shown by the following production figures from which the average annual production

(page 5 of original)

increase has been ascertained:

SO₃ production in million tons.

	<u>1913</u>	<u>1937</u>	<u>increase per</u> <u>annum</u>
World +)	7,7	14,9	3,9 %
U.S.A. +)	1,7	4,4	5,6 %
Germany	1,4	1,7	0,9 %

+) figures excerpted from Chem. Met. Eng. (Chemical Metallurgical - Engineering Year-Book) 47., 59 (1940) and Statistical Year Book of the German Reich 1938, 86 (supplement)

These figures prove that the expansion of the German production was a very moderate one, and in this connection it may again be pointed out that the I.G. did not even keep up with this moderate speed of the German productive expansion.

- 4.) As regards the many-sided use of sulphuric acid this can be explained by the figures covering the whole German area (enclosure). The circles shown therein give evidence of the extensive subdivision of the use including the re-extracted acid used again in the years 1936, 1937, 1938 and 1939. It is evident from the individual sectors that the sulphuric acid was mainly used for the manufacture of fertilizers containing nitrogen (sulphate of ammonia) and phosphorus and to an annually increasing extent in the manufacture of artificial silk and cellulose wool. The use of sulphuric acid in the production of powder and explosives (including explosives for civilian purposes, mining etc.) was comparatively small and in all these years amounted to only 5,0, 3,0 and 3,4 % respectively, and even in the first year of war (1939) it increased only to 11,4 %. Moreover, it must be taken into consideration that the actual use of sulphuric acid in the explosive and powder sector was only approximately 20% of these figures, viz. approximately 1,0, 1,6, 1,7 and 2,3 % respectively.

Document Book II WURSTER
WURSTER Doc. No. 7 295
Exh. No.

(page 6 of original, cont'd)

This is traceable to the fact that in the explosive and powder sector sulphuric acid is largely not wasted, but can be re-extracted and used again. The U.S.A. consumption figures for 1937, 1938 and 1939 corresponding to the German percentages of

though it must be taken into account that the American figures are absolutely about twice as high as the German consumption figures in the powder and explosives sector.

5.) The development in Germany of the sulphuric acid sector was decisively determined by the food sector (manufacture of sulphate of ammonia as fertilizer) and by the clothing sector (manufacture of synthetic fibers). These two branches of manufacture used huge quantities of sulphuric acid. The cellulose wool and artificial silk manufactures for instance, where almost 2000 kilograms of sulphuric acid go into each 1000 kilograms of cellulose wool used 134.000 tons of SO_3 in 1936, which increased to as much as 354.000 tons of SO_3 in 1939.

Owing to the difficulties of obtaining the foreign exchange required for the importation of wool and cotton practically all textiles were more or less mixed fabrics of cellulose wool and art silk. And that was by no means a pure "ersatz" economy, because these synthetic fabrics were quite satisfactory for certain uses, so far as quality was concerned. This is also evidenced by the fact that even countries which were not confronted with foreign exchange difficulties had considerably pushed ahead the production of such fibers in those years. Thus, Chemical Metallurgical Engineering, February 1942 copy, contains a report stating that in the U.S.A. the manufacture of viscose products amounted to over 230.000 tons in 1941, which means that the cellulose wool production had exceeded that of 1940 by over 50 %.

Neither during my activity in the I.G. nor in the course of my occasional function as honorary adviser to RAUPE's office did I ever hear anything about an appreciable expansion of the German sulphuric acid consumption in the armaments sector in the years

preceding the War. From the date to which I gained access only later in the War it is evident that the consumption in the powder and explosives sector including powder for hunting ammunition, explosives for use in mining and other technical explosives was quite insignificant in proportion to the German total consumption. (See paragraph 4). In any case, it could by no means be inferred from this quite insignificant use of less than 2 % of the German sulphuric acid consumption for the powder and explosives sector - which was absolutely proportionate to the peace-time consumption in U.S.A. -

that an aggressive war was planned. Accordingly, the comparatively small share of Oleum (concentrated sulphuric acid) in the total German SO_3 production could not arouse any suspicion.

The increase of the demand for SO_3 for the manufacture of celluloses wool prior to the War, as shown in the enclosure, intensified during the War. From 1942 on, the synthetic fiber has been the biggest single German consumer of sulphuric acid. In consequence, - apart from the fertilizer and explosives sectors - all efforts to save the production of this basic chemical product, sulphuric acid, threatened as it was by lack of raw materials and air raids during the War, particularly benefited this biggest consumer of sulphuric acid.

5.) Nor did the development of the agreement policy of the I.G. in the field of sulphuric acid admit of any inferences as to the planning of an aggressive War. In 1934, from Ludwigshafen, I started negotiations with the Metallgesellschaft and its subsidiary company, the Lurgi G.m.b.H. for Chemistry and Metal Smelting and, later on, with the Verein fuer chemische und metallurgische Produkte, of Prague with the result that Ludwigshafen reached an agreement with these two companies including an unrestricted mutual exchange of technical experiences, and decided to place at the disposal of the Lurgi company as the leading firm, all experiences gained in the construction of contact-sulphuric acid plants on behalf of any third interested parties at home and abroad. The profits were divided on an agreed rate.

The Lurgi, as the leading firm in this contractual fusion, steadily pursued an active business policy also abroad up to the outbreak of war. There was definitely no restriction in this activity, any with the aim of weakening the war potential of other countries. This not only applied to the markets of contact - sulphuric acid handled by the Lurgi as the leading firm but also

to the field of gypsum-sulphuric acid, as set forth in detail
in the affidavit of Herr Dr. Wilhelm PFANNKUELLER, dated
6 November 1947.

Muenberg, 31 December 1947

signed: Dr. Carl WURSTER

I herewith certify and attest the above signature of Herr Dr.
Carl WURSTER, given before me, Dr. Wolfgang HEINTZELER, at present
Muenberg, Palace of Justice.

Muenberg, 31 December 1947.

signed: Dr. Wolfgang HEINTZELER

Attorney-at-law.

COPY.

Affidavit.

I, the undersigned Dr. Alfred von NAGEL, born 13 August 1903, residing at Volfrustr. 8, Ludwigshafen on Rhine, having been warned that I render myself liable to punishment if I make a false affidavit do hereby declare on oath that my statements are the full truth and were made to be submitted in evidence to the Military Tribunal in the Palace of Justice at Saarbrück/Germany in Case 6.

- 1.) On 1 January 1927, in the capacity of a chemist I entered the services of the I.G. Farbenindustrie Aktiengesellschaft Ludwigshafen on Rhine. Since 3 September 1939 I have been working in the Commercial Department T of the Ludwigshafen on Rhine plant.
- 2.) I know the affidavit of Herr Direktor Dr. WURSTER, dated 31 December 1947, document WURSTER No. 295. I declare that I have checked the figures stated therein, basing my examination on the documentary material of the Ludwigshafen plant of the I.G. and I confirm that these figures are correct to the best of my knowledge and belief.

Ludwigshafen on Rhine, 15 March 1948

(signed) Dr. Alfred von NAGEL

The above signature of Herr Dr. Alfred von NAGEL, given before me, Dr. Wolfgang HEINTZELER, Ludwigshafen on Rhine, Bruckstrasse 13, is herewith certified and attested by me.

Ludwigshafen on Rhine, 15 March 1948.

(signed) Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Excerpt from the minutes of the 55th meeting of the
Sulphur-Uko on 30 January 1937 in Frankfurt on Main.

(Page 4 of original)

1.) Prospects and Review of the work done in the sphere
of the Sulphur-Uko.

Assisted by diagrams, TURSTER gives a survey of
the course of the present development of the pro-
ducts marketed by the Sulphur-Uko.

1. SO₂

a) Production:

.

b) Demand:

At present the SO₂ demand for Germany approx-
imates, 1,6 billion tons SO₂. In the first
half of 1937 supplies will be a bit scanty, in
the second half they will be more plentiful.
Subdivided into groups, the requirements will
be as follows:

41 %	in fertilizers	sector
14 %	" artificial food	"
8 %	" explosives	"
7 %	" sulphate/Hydrochloric and P	"
4 %	" iron pickles	"
2 %	" mineral oil	"
24 %	" a variety of other lines, above all in the spheres of semi- finished products and dyos.	

.

.

Certified true copy of above excerpt

Nuernberg, 22 March 1948

(signed) Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Excerpt from the minutes of the 55th meeting of the
Sulphur-Uke on 30 January 1937 in Frankfurt on Main.

(Page 4 of original)

1.) Prospects and Review of the work done in the sphere
of the sulphur-Uke.

Assisted by diagrams, WITSER gives a survey of the
course of the present development of the products
marketed by the Sulphur-Uke.

1. SO₂

a) Production:

b) Demand:

At present the SO₂ demand for Germany approx-
imates, 1,6 million tons SO₂. In the first
half of 1937 supplies will be a bit scanty, in
the second half they will be more plentiful.
Subdivided into groups, the requirements will
be as follows:

41 %	in fertilizers	sector
14 %	" artificial food	"
8 %	" explosives	"
7 %	" sulphate/Hydrochloric acid	"
4 %	" iron pickles	"
2 %	" mineral oil	"
24 %	a variety of other lines, above all in the spheres of semi- finished products and dyes.	

Certified true copy of above excerpt

Munich, 22 March 1948

(signed) Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Excerpt
from the minutes of the meeting of the anorganic
chemists on 30 June 1939 in Leverkusen.

Page 2.

SCHLIP

In discussing the SO_2 balance for 1940 which will probably show a deficit of 60 000 tons mention is made of the enormous consumption of SO_2 in the production of cellular wool. It is planned to expand the cellular wool capacity to 245 000 tons per annum entailing a consumption of 315 000 tons per annum of SO_2 (exceeding the 1939 consumption by 115 000 tons per year)

KUEHNE recommends an investigation into the question of whether to expand the Supram instead of the Viscose capacity, because in that case much less chemicals such as SO_2 and NaOH are used and no waste sulphate is produced. The reply to the objection that this would involve the necessity of importing linters from abroad is that the latter are cheaper than imported cellulose which would have to be imported anyway.

.

Certified true copy of the above excerpt.

Saarnberg, 20 March 1948.

Attorney-at-Law.

COPY 1

CONTROL OFFICE "CHEMISTRY"
(Ueberwachungsstelle Chemie)
Berlin 7 35, Sigismundstrasse 5

Gessrs.

I.G. Farbenindustrie A.G.,
Attention Herr Direktor SCHMIDT,

Frankfurt/Main
Bruneburgplatz

Dictation: Dr.v.E./Le
8 March 1937.

Subject: Decree 5 of Control Office "Chemistry"

I.

With reference to our conversations regarding this matter I wish to point out again that the general permit for the supply and home use of sulphuric acid granted by me until further notice in accordance with article 2 paragraphs 1 - 3 of my decree No. 5 (Reich Law Gazette No. 298 of 22 December 1936) is herewith cancelled, in accordance with article 2 paragraph 4 of the above-mentioned decree, by your request for the specification of your supply schedule.

You may therefore use and/or deliver sulphuric acid only to the extent as you have been granted express permission by me. I must duly call your attention to the fact that any use and/or supply of sulphuric acid not covered by my permission is punishable according to article 4 of my decree No. 5.

II.

The quantity of sulphuric acid at your disposal in March - irrespective of whether originating from your own production, re-extracted (waste acid, re-extracted acid etc) or bought by you additionally - is to be distributed by you as follows:

- 1.) The current actual requirements of the plants explosive producing and belonging to the I.G. combine are to be met in full. In meeting the requirements it is to be taken into account that adequate stocks must be kept by the individual plants. Should you be unable to reach an agreement with your plants as to the adequacy of the stocks I am prepared, if need be, to decide on my own authority.

(page 2 of original)

- 2.) The same principles which are set forth under 1.) will apply to your artificial silk and cellulose wool products.
- 3.) The allocations to be made by you in March to firms not belonging to the I.G. concern are to be effected in accordance with the delivery quotas laid down on 3 March 1937. At the same time I am enclosing the list of quotas for March 1937 covering your 3 markets. May I point out that the figures therein stated were determined by me on 3 March 1937 already. I only increased the quota for the firm of Nicolaus ROYBERG from 72 to 117 tons of SO_3 in consideration of the exceptional conditions existing there. It will be alright as far as I am concerned if in handling the individual quotas you interpret your supply permit in such a way as to round the quantities involved either way as that you may be able to despatch full tank cars. However, the quantities supplied each month in excess or short of the quota will be carried forward to the quota of the following month.
- 4.) You are at liberty to use within the I.G. concern those quantities which are left after providing for the supply commitments relative to 1 - 3, without me determining, for the time being, the distribution among the individual plants. I charge you, however, to make available in full those quantities of acid which are required for export products. This means that any cuts in the use of sulphuric acid will affect only the production of such merchandises as are intended for sale on the home market. Even so, you will have to give consideration to the economic

Document Book II JURISTEN
JURISTEN Doc. No. 7 599
Exh. No.

(page 2 of original, cont'd)

importance of the individual articles.

Control Office "Chemistry"
(Ueberwachungsstelle "Chemie")
The Reich Commissioner:
(signed) UNGERTTTER

Enclosures.

I, Attorney-at-Law Dr. Wolfgang HEINTZELER, Ludwigshafen on Rhine, do hereby certify that the above is a literal copy of the original document in the files of the I.G. Farben-Werk Ludwigshafen.

Ludwigshafen on Rhine, 15 March 1948

(signed) Dr. Wolfgang HEINTZELER
Attorney-at-Law.

C o p y

Notes concerning a conference in Berlin with the representatives of the Reich Ministry of Economics on 9 March 1937.

Present:	Geh. Rat Dr. KUGLER	}	Reich Ministry
	Assessor Dr. HOFFMANN		of Economics
	Dr. UNGELITZER	}	Supervisory
	Dr. von BINSIEDEL		Office for
			Chemistry
	Director H'ESLIGER	}	I.G. Frankfurt
	SCHLAF		
	Director Dr. WURSTER	}	I.G. Ludwigshafen, Economic
	Dr. STENZEL		Political Division Berlin

- - - - -

Sulphuric Acid.

Following today's preliminary discussion with the gentlemen of the Supervisory Office, the Reich Ministry of Economics has been informed in detail of the difficulties which have arisen concerning I.G. supplies of sulphuric acid by the demands made by the Supervisory Office. Dr. UNGELITZER outlined the sulphuric acid situation in general as follows:

1936 requirements for German consumption 1,500,000 tons.
 This demand was covered as follows:

Production 1,435,000 tons
 the remainder of 155,000 tons could be put up as waste acid (130,000 tons) and the rest of 55,000 tons by way of import surplus from Belgium.

The additional demand required for 1937 is as follows:

Nitrogen (cooking plants)	51,000 tons
Super-phosphates	20,000 "
Span rayon/artificial silk	149,000 "
Explosives	59,000 "
Miscellaneous	110,000 "
Total additional demand	400,000 tons

The item "Miscellaneous" is composed of the following main items:

(page 2 of original)

sodium sulfide	16,000 tons	Refining of benzene	3,000 tons
alumina sulfide	12,000 "	"	" Gasoline
Pigment colors	12,000 "	"	" 1,000 tons
other mineral oil products	1,500 "	"	" lubricating oil 2,000 tons
Splitting of fats and oils	6,000 "	"	" of vegetable fats 500 tons
Tannins and metal products	8,000 "	"	" Tanning agents 1,000 tons
Metallurgical purposes	5,000 "	"	" Cellophane 2,500 tons
Cryolite	10,000 "	"	" Production of organic acids 1,500 tons
Phosphor salts	5,000 "	"	" Conversion of wood to sugar 2,700 tons
Synthesis of fats	6,000 "	"	"

For 1937 the following surplus can be expected:

Surplus production	150,000 tons
Surplus of waste acid as by-product	30,000 "
from increased imports	10,000 "
	190,000 tons

so that against the above-mentioned surplus demand of 400,000 tons a total deficit of 210,000 tons remains uncovered.

For the month of March the Reich Ministry of Economics sees no possibility of modifying the demand in some way or other. General KUGLER states that the I.G. must meet this demand.

Herr Director HIEPLER stresses in particular the effects which would result should the I.G. because of curtailment or shutting down of certain plants would have to reduce their sales and stores abroad.

The Reich Ministry of Economics is going to examine without delay the following questions:

(page 2 of original, cont'd)

- 1.) Whether it is possible to reduce the necessary supplies for armament plants by appropriate intervention with the Reich Ministry of War.
- 2.) Whether it is possible, by pointing out the special conditions at the Schwarze Spun Rayon Factory, to cut down the necessary supplies of sulphuric acid to the spun rayon and artificial silk industries.
- 3.) Whether it is possible to increase imports of sulphuric acid from Belgium and/or Holland. Herr SCHMIDT has been instructed

(page 3 of original)

to open at once negotiations with Mr. ANSIAD of the
Société Générale des Minéraux, Brussels, to this effect.
Following today's conference the following telegram
was sent to the I.G.'s supplying firms of sulphuric
acid:

"Sulphuric acid. The deliveries ordered by the
sales department must be carried out at all events
at due date stop also the necessary supplies for
I.G., explosive plants and for I.G. spun rayon
and artificial silk factories must be delivered in
full stop the rest of internal requirements and
deliveries within the I.G. plants, unless destined
for explosives and artificial fibres, are to be
cut down until further notice and pending de-
tailed regulation stop further measures to be taken
will be discussed at a special meeting of Sulfur-
Udo Tuesday 0930 hours 16 March at Frankfurt-main
to which the representatives of the three main-
consumption-branches will be invited also stop
the regulation has been decreed for March by the
Supervisory Office under threat of punishment."

To-morrow Herr Dr. WURSTER is going to summon the per-
sons who are to attend the meeting mentioned in this
telegram.

sch/s

signed signature

Distribution:

Director WERER-ANDRAE
" Dr. KUEHNE
" Dr. PISTOR
" HAEPLIGER
Dr. EIL MEER
Director Chemical Section
" Dye Section
Section S, Frankfurt/Main

Director Dr. WURSTER
" WESPHAL
Branch Office Lehnachlen-
strasse
Sales Dept. Chemistry
Leverkusen
Director Dr. BUERGEL
Dr. FRENZEL
TEA-Office Frankfurt/Main
Immunis Plant Merseburg

Document Book II JURSTER
JURSTER Doc. No. 7 581
Exh. No. 1 1 1

(Page 3 of original, Anti-C)

I, Dr. Wolfgang HEINTZELER, Attorney-at-Law,
Ludwigshafen/Rhine, Bruckstrasse 13, certify that
the foregoing copy is a literal copy of the files of
the I.G. plant Ludwigshafen/Rhine.

Ludwigshafen/Rhine, 15 March 1948.

signed: Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Copy

I.G. Farben, Ludwigshafen/Rhine, Inorganic Department.

Ludwigshafen/Rhine, 11 March 1937
W/S.

To	Herr Director Dr. ter MEER,	Frankfurt/Main
"	" Dr. KUSCHE	Leverkusen
"	" Dr. PISTOR	Bitterfeld
"	" WEBER - ANDREAS	Frankfurt/Main
"	" Dr. GAJEWSKI	Frankfurt/Main

	and to the members of the Sulfur-Unit	
Herr Dr. BACHMAN	Hoechst	
Herr Director Dr. BURGIN	Bitterfeld	
"	" Dr. v. STADEN	Leunawerke
"	D-I. TEUFEL	Leverkusen
"	Director Dr. WOLF	Duisburg

and to

Herr Director v. WEIDER	Frankfurt/Main
" Dr. REISSMANN	Wolfen
" Director WESTPHAL	Berlin SO 36
Sales Department Chemicals, Dept. S	Frankfurt/Main
Herr WOLTERS, Sales Dept. Chemicals	Leverkusen
Tea-Office	Frankfurt
Control Office, Sparta I	Oppau.

Subject: Sulphuric Acid Supply of the I. G.

Supplementary to my circular of 11 March 1937, please find below
as an example the balance sheet of March 1937:

(page 1 of original, cont'd.)

Presumable production of the I. G.	48 475 tons SO_3
plus remaining acid	1 500 " "
" acid from waste products	4 241 " "
<hr/>	
Production of the I.G. Farben, including	
remaining acid	54 296 tons SO_3
plus purchases (acid)	4 370 " "
<hr/>	
Entire quantities at the disposal of the I. G. Farben in March	58 666 tons SO_3
reported consumption of the I. G. Works	44 268 " "
<hr/>	
Free for sales	14 398 tons SO_3

(page 2 of original)

In agreement with the sales department, the SO_3 supplies to the I.G. Works have been handled in such a way until the end of February that certain restrictions, of an insignificant nature hitherto, were made in the interest of obligatory sales which were of particular urgency. We mainly reduced supplies to the Works of the Dynamite A. G., because we had not been told of the extensive consumption of this company and it could not be satisfied therefore on short notice without detriment to the other consumers.

The Plants of the Dynamite A.G. have lodged complaints with the control office "Chemistry" direct in connection with this practice.(1)

The Control Office expressed the opinion to us that such internal controversies should best be arranged within the I.G. The complaint was then submitted to the HVA and resulted in the control office interfering with our administration of Sulphuric Acid, beginning March 1937 contrary to earlier practice.

Already in March this fact will result in a compulsory sale of 19 246 tons SO_3 being imposed upon us so that only 39 420 tons will remain for I.G. consumption, which means a deficit of 4 848 tons SO_3 . As an additional imposition, we shall be compelled to meet the requirements of the production of explosives and artificial fiber 100% within the I.G. Since these two groups will consume approximately 21 000 tons SO_3 in March, the entire cut of 4 848 tons SO_3 will have to be distributed in such a way as to affect consumers with a joint consumption of about 23 000 tons, which means that reductions of 20 to 25% must be made which will lead to trouble which as yet cannot be foreseen.

(page 2 of original, cont'd.)

The absurdity of this regulation could be proved by many examples. In this connection I only want to mention that we shall be compelled to curb the activities of our own sulphated hydrochloric acid producing plants, but that we shall have to supply sulphated hydrochloric acid to other firms; that we shall be compelled to supply producers of superphosphate, but shall have to restrict the production of our Nitrophoska plants in Oppau. As we also use nitric acid in the production there, we need only 380 kilos SO_3 per ton of raw phosphate in comparison with 580 kilos of SO_3 per ton of raw phosphate produced by the

(page 3 of original)

superphosphate industry. In addition, calcium sulphate which results from the process mixed with ammonium carbonate could be converted into ammonium sulphate and thus made profitable. Quite a number of similar cases have already been reported to the Reich authorities orally.

signed: FURSTER

§ Director Dr. MUELLER, Troisdorf

This is to certify that the foregoing is a literal copy from the files of the I.G. Farben Ludwigshafen/Rhine.

Ludwigshafen/Rhine, 15 March 1948

signed: Dr. Wolfgang HEINTZELER

Dr. Wolfgang HEINTZELER

Attorney-at-Law

Sony

(from Pros. Exp. 1940)

DYNAMITE-Aktiengesellschaft (Initials)

Dr. Paul MUELLER

To:
Director Dr. GAJEWSKI
Wolfen, Kr. Bitterfeld

for information.

(stamp)
43015
Secr. Dr. GAJEWSKI
Rec'd: 15 March 1937
Answ. to.....

Troisdorf, 12 March 1937

(Page 4 of the original)

(handwritten)
D.A.G.

No. 868

12 March 1937.

(Initials)

Es.
(stamp) 43 015
Secr. Dr. GAJEWSKI
Rec'd: 15 March 1937
Answ. of Dr. WURSTER
13 March (43066)

Herrn

Dr. Carl WURSTER
I.G. Farbenindustrie Aktiengesellschaft

Ludwigshafen/Rhein

Dear Dr. WURSTER,

Ref.: Sulphuric Acid Supply of the I.G.

I herewith gratefully acknowledge receipt of your kind letter of 11 March. I must put considerable stress on correcting a mistaken opinion of yours. You write that, because of a complaint of my plants to the appropriate Reich agencies compulsory rationing of sulfuric acid was imposed on I.G. Never would we have acted so unloyally or rather incorrectly towards I.G. and I herewith must refute this accusation politely but emphatically.

(Page 4 of original)

The actual facts are as follows:

The Army Ordnance Office gave us the strict order to inform it continuously if the required production quota could not be reached or seemed endangered. Several times we informed the appropriate I.G. offices of this fact so that they were fully informed in regard to our duties towards the Army Ordnance Office. In those cases in which we could not fully complete the assigned orders, we were, therefore duty-bound to report to the Army Ordnance Office the amounts which would apparently be lacking and what was the reason for the deficiency.

* 42982; see 64/3-31

(Page 5 of original)

2. 12 March 1937 to Dr. WURSTER, I.G., Ludwigshafen.

This and nothing else has happened. I emphasize that from our side no steps were undertaken with the Supervisory Office Chemistry. If, therefore, on the basis of reports to the Army Ordnance Office, situations arose which are unpleasant for I.G., we must refuse to accept any responsibility.

Unfortunately I, myself, am absolutely unable to take part in the Frankfurt meeting on 18 March. I requested, however, Director Dr. F. OPACH and Director WEITH to represent me and I emphasize that I have given both gentlemen complete authority to act in my behalf.

And, dear Dr. WURSTER, I also must refer to a sentence in your circular to the authorities concerned. In this circular you expressed the idea that the large consumption of the D.A.G. plants had not at all been reported to you.

Actually the situation is that our Purchase Department regularly informs the places named to us as being the offices concerned - namely the I.G. sales combine Berlin and Leverkusen - about the requirements for the month in question. Dr. P. OPACH and Mr. VEITE will, of course, have an opportunity to supplement and to prove these statements orally. You will understand, dear Dr. WURSTER, that, in view of the grave accusation made against us, I am sending copies of this letter to all places that were referred to in your circular.

With the German salute,

Very truly yours

(stamp) signed: Dr. P. MUELLER

CERTIFICATE

I, Yvonne A. SCHWARTZ, ETO No. 20108, hereby certify that the above is a true and correct copy of Document No. WI-13571, the original of which is in the German language.

YVONNE A. SCHWARTZ
ETO. No. 20108

- 3 -
END

I, Dr. Wolfgang HEINTZELER, Attorney-at-Law, Ludwigshafen/Rhein Brunckstr. 13, certify that foregoing copy is a true copy of the letter of Herrn Dr. P. MUELLER to Herrn Dr. C. WURSTER of 12 March 1937, contained in the Prosecution Exhibit 1940.
Ludwigshafen/Rhein, 15 March 1948.

signed: Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Copy

(from Pros. Edh. 1940)

(handwritten note) DAG
13 March 1937, W/S.

To: Herr Director Dr. GAJEWSKI, Frankfurt/Main

(handwritten) G

(handwritten notes)

3 K

(Herr Dr. ESSELKAMM)

(intern: this was the
80%-consumption of the
cellulose-wool-factory W-lfen)

To:
Director Dr. Paul MUELLER

Dynamit-Aktiengesellschaft
former Alfred NOBEL & Co.

TROISDORF

(District of Cologne)

(stamp)

Secr. Dr. GAJEWSKI
Rec'd: 16 March 1937 43 056
Answ.

(Initials)
Dr

My dear Doctor,

Thank you very much for your letter of 12 March 1937. I regret that you yourself are not able to take part in the meeting but I appreciate your being able to send Director Dr. PROPACH and Director VEITH.

The statement in my circular of 11 March that your plants have complained to the supervisory office about not receiving deliveries was based on the letter of your Purchase Department, Troisdorf, dated 1 February 1937. This letter states literally at the end: "Within the frame of this obligation (to the Army Ordnance Office) we reserve the right to address ourselves within the next few days to the Supervisory Office 'Chemistry' directly." On the basis of this letter and on the basis of Dr. UNGEWITTER's oral confirmation that this step had been undertaken, I had to reach the conclusion which I put down in my circular of 11 March.

In regard to my remark that your large consumption was not announced to us, I wish to say in the way of an explanation that it is correct that your Purchase Department has always announced to us the needs of your plants one month in advance. Because of the unexpectedly great increase of your requirements, this naturally did not help because we expected you to announce your requirements to us at least one year ahead.

* 43015

(Page 2 of original)

so that we could undertake the necessary measures in our SO₂ plants. In view of the present difficulties in procuring material, greatly increased requirements which are announced only a short time ahead cannot be fulfilled even with the best of intention without hurting other consumers.

I do not know whether, on the basis of the enlargement of your plants in the other direction you yourself were in a position to announce to us much earlier your SO₂ requirements or whether that was not possible because of the negotiations with the Army Ordnance Office. We will have an opportunity to discuss this matter with your gentlemen next Tuesday. If you could not announce the requirements this means that there exists, here too, a lack of synchronization in starting the operations of the plants for finished products and the plants for the required preliminary products. I hope, dear Doctor, that with the above lines I have given you an explanation for the contents of my circular of 11 March.

With the German salutation
Very truly yours

(stamp) signed: WURSTEL

Document Book II WURSTER
WURSTER Document No. W 594

I, Dr. Wolfgang REINTZLER, Attorney-at-law, Ludwigshafen/
Rhein, Brunenstr. 13, certify that foregoing copy is a true
copy of the letter of Herrn Dr. C. V. WURSTER to Herrn Dr. P. MUELLER
of 13 March 1937, contained in the Prosecution Exhibit 1940.

Ludwigshafen/Rhein, 15 March 1948

signed: Dr. Wolfgang REINTZLER

attorney-at-law.

Copy

Dr. Paul MUELLER
No. 914

Freisdorf, District of Cologne,
15 March 1937

By Registered Mail.

Herrn

Dr. Carl WURSTER

Ludwigshafen/Rhein.

Dear Herr Dr. WURSTER,

I am very sorry but I wish you had not taken up again, by letter, the Olcum-affair, since the Frankfurt meeting has already been scheduled for Tuesday. I am therefore forced to state in writing unequivocally that the accusations you see fit to level against my Company and my representatives respectively, lack any basis whatsoever, as will be shown in detail by Herr VEITH at the Frankfurt meeting.

At the same time, I am forced to state that according to our files which we have gone through again carefully we had to be under the impression that you had reduced our supplies in the same ratio as those of your other customers. Had we known that, as you state yourselves, our supplies had been reduced by practically the whole amount of the shortages, it would have been our duty to discuss with you the form in which we would have had to inform the Reich Ministry of War of that fact. I state here explicitly that we had no knowledge of that fact and therefore refuse for myself and my representatives to accept any responsibility for it.

With the German salute,

Very respectfully Yours

signed: MUELLER

Handwritten notes: Long live the willingness to shoulder responsibility

I, Dr. Wolfgang HEINTZELER, attorney-at-law, Indwighafen/Rhein,
Brunckstr.13, certify that the above copy represents a true copy
from the files of the I.G. plant Indwighafen/Rhein.

Indwighafen/Rhein, 15 March 1948

signed: Dr. Wolfgang HEINTZELER,

attorney-at-law.

EXCERPT

I.G. FARBENINDUSTRIE AKTIEGESELLSCHAFT LUDWIGSHAFEN/MAIN, LOWE GARTS
DEPARTMENT

Memorandum on the 57th meeting of the

SULFUR-UKO

on 16 March 1937 in Frankfurt on Main.

Start: 0940 hours - End: 1400 hours.

Index:

- 1) The situation and its probable development,
pertaining to sulphuric acid as far as Germany
and the I.G. are concerned. Page 4

.....

Participants:

TEH KEER	Frankfurt	temporarily
WURSTEL	Ludwigshafen	chairman
APITZ	Leverkusen	
BACHER	Bosch	
BUECKEN	Ditterfeld	Members of the
v. STADEN	Leinwerke	Sulfur-Uko.
TEUFEL	Leverkusen	
WOLF	Duisburg	
SCHUSTER	Berlin	
KUSS	Duisburg	
v. HEIDEN	Frankfurt	temporarily
STAUSS	"	"
SCHAAF	"	"
BISFELD	"	"
ZINGERNANN	"	"
WEIGANDT	"	"
STADT	Bosch	
HAASER	Leverkusen	
THIERMANN	"	
WOLTERS	"	
WOLTERS	"	
SEIDEL	Ludwigshafen	temporarily
A. MUELLER	" (Open)	"
BACHOFEN	Urdingen	
BUECKEN	Wolfen-Farben	
ESSELMAIER	Wolfen-Film	
R. NOPACH	Dynalit A.G.	
VEITH	"	
PFANNMUELLER	Ludwigshafen	(in charge of the records)

./.

- 1.) The situation, and its probable development, pertaining to sulphuric acid as far as Germany and the I.G. are concerned.

WURSTER:

.....
We were startled by the unusual demands made upon us from within the I.G. especially by the works of the D.A.G.

Here, VEITH spoke up and protests in the name of his Company against accusations leveled against it. He reads out a copious documentary note, quoting in part verbally the correspondence between the I.G. and the Dynamit A.G. as of April 1936.

WURSTER replied that the correspondence as of spring 1936 just does prove that knowledge of the demand was gained much too late; for, in view of the current critical employment situation, large requirements cannot be satisfied within a few months.

The gentlemen of the DAG replied that the orders in question were always given by the Reich War Ministry as short term orders. When the DAG pointed out the difficulties in the procurement of raw materials, the Reich War Ministry replied that that matter would be taken care of by the Reich War Ministry. Therefore the DAG had not informed the I.G. about the situation.

.....
I, Dr. Wolfgang REINTZELER, attorney-at-law, Ludwigshafen/Rhine, Bruckstr.13, certify that the above document is a true excerpt from the photostat copy of the memorandum on the 57th Meeting of the Sulfur-Use of 16 March 1937 in Frankfurt on Main, as made out by the Inorganic Department of the I.G. Farbenindustrie Ludwigshafen/Rhine.

Ludwigshafen/Rhine, 15 March 1948

signed: Dr. Wolfgang REINTZELER,
Attorney-at-law.

EXCERPT

from the Memorandum on the Meeting of the Committee on Chemicals
of 5 July 1933 in Frankfurt.

Page 3.

.....

There are no objections, from the point of view of the I.G. -
as well as from the point of view of the collective interest
of national economy - against letting the Russians have our
process for the manufacture of sulphuric acid from pyrosulphur.
The question is to be discussed with Herr MUEHLER.

.....

This is to certify the correctness of the above excerpt.

Muenberg, 30 March 1948.

signed: Dr. Wolfgang REIPERLE,
Attorney-at-Law.

Excerpt from the 48th Meeting of the Committee on Chemicals
in Berlin, Saturday, 4 December 1937.

.....
.....

In this connection, Dr. ter MEER mentions the visit he paid,
together with Herr von SCHWITALEN, to St. Gobain, while in
Paris for the Chemistry - Week. During the talk that took
place, St. Gobain expressed its interest in our process for
the manufacture of sulphuric acid from gypsum, because of the
uncertainty of supplies of pyrites from Spain for the duration
of the Spanish Civil War.

.....

This is to certify the correctness of the above excerpt.

Munich, 30 March 1948

signed: Dr. Wolfgang REITZLER,
Attorney-at-Law.

Excerpt

from the Memoandum on the 43rd Meeting of the Committee on
Chemicals, Berlin, 12 April 1938.

Page 5.

.....

According to information received by Dr. KUEHNE, it is planned
to erect a plant for the manufacture of sulphuric acid from
pyrites in Roumania, and we have been asked if we want to participate
in this project. Although Roumania has cheap pyrites at her
disposal, this project appears to be founded on serious interest.
NEUER-AMERLAE therefore suggests to take this matter up with
Rort Director General PHILIPP, and when he is going to Vienna
again, he will use the opportunity to discuss this point.

.....

This is to certify the correctness of the above excerpt.

Eschenberg, 20 March 1948

signed: Dr. Wolfgang REINTZLER

Attorney-at-Law.

EXCERPT from the minutes of the meeting of the Sulfur-Wko
of 26 September 1934 in Wolfen.

.....

(page 7 of original)

9.) Sulphuric acid from gypsum in Central Germany.

.....

d) Wolfen states reasons for its project which provides,
according to the Wolfen circular letter of 22 September
1934 for a credit of 4.105.000.— .

After exploratory discussion of the technical aspect
it is decided upon that REISSMANN and CL. MEILLER should
make, possibly together with KURST, a final technical
examination of the projected plant. The Sulfur-Wko
agrees to the plan to immediately provide for the con-
struction of the entire plant.

e) As to the risk involved, concerning the plant, the Sul-
fur-Wko takes the attitude that the Sulfur-Wko is pre-
pared to build a plant, if rayon requires sulphuric acid.
Even taking into consideration that there are also
other factors favoring the construction of a plant for
the manufacture of sulphuric acid from gypsum (preserva-
tion of experiences made in this field) in Central
Germany, amortization must be attained more speedily
than normally, lest one day, in the possible case, that
the present prerequisites are no longer given, we have
a construction job on hand the rate of amortization of
which is too high, since the Reich has refused a guaran-
tee covering also the preliminary products of rayon.

(page 2 of original)

The cost price for sulphuric acid from gypsum to be expected at a normal rate of amortization would be considerably lower than the cost price of the present Central German plants and the market price.

Therefore it has been decided to move that the plant is to be amortized within 5 years at the utmost.

This is to certify to the correctness of the above excerpts.

Muenberg, 22 March 1948.

signed: (Dr. Wolfgang HEINTZELER).

Attorney-at-Law.

EXCERPT from the minutes of the joint meeting of the Chlor-
and Sulfur-Werke of 22 April 1936 at Hoechst.

.....

.....

(page 6 of original)

3.) a) New Project Sulphuric Acid from Gypsum.

(Plant in Central Germany for the manufacture of sulphuric
acid from gypsum according to the HUEFELT-KUEHNLE process)

Sulphuric acid being in short supply in Central Germany,
Walton re-examined the prospects for a plant for sul-
phuric acid from gypsum.

May it be stated right away that the examination
showed that the cost price of SO_3 would be equal to,
perhaps somewhat higher than, the cost price for SO_3
produced by a plant of the same size but working with
pyrites. However, quite apart from the actual purpose
of meeting the demand, the construction of a plant
for sulphuric acid from gypsum would be desirable be-
cause of the extension of knowledge gained in this
field by building a German plant, possible license
revenues and the renewal of pyrite contracts.

.....

.....

b) New project Leuna.

.....
.....

(page 8 of original)

Accordingly, the result of the examination of the SO₂ situation may be stated as follows:

In view of the new requirements as reported in Wolfen for their expanded manufacture of cellular wool, the Sulfur-Werke deems it necessary and, in agreement with Sales Dept., considers the increase in the capacity of the I.G. in Central Germany by 30 to 40 000 tons per year as justified.

The economic and technical aspects of the new projects in question, sulphuric acid from gypsum, Wolfen or the Leuna plant SO₂ from H₂S will be discussed on 12 May 1936 at Hoechst. The project judged more promising will be suggested to the TEA for execution.

.....

.....

This is to certify to the correctness of the above excerpts.
Hannover, 22 March 1948.

signed: Dr. Wolfgang
HEINTZELER
Attorney-at-Law.

EXCERPT from the minutes of the 61st meeting of the
SULFUR-UKO on 1 April 1938 in Frankfurt/Main.

..... (Page 11 of the original)

6) Credit and expenditure on experiments II/1938.

a) Credits.

.....

Sulphuric acid from gypsum, Wolfen.

.....

The price of SO_3 , figured at one time at RM 3.66/kg will rise to about RM 3.90 in view of the increased rate of amortization. Savings may however be expected from raw material which is cheaper than had originally been expected. In comparison, it was again recalled that SO_3 from pyrites would cost here RM 4.50/kg.

This is to certify to the correctness of the above excerpt.

Munich, 23 March 1948.

signed: Wolfgang HAHNLEIN
Attorney-at-law.

Excerpt from the
Minutes of the 64th meeting of the Sulfur-Lite on 10 January
1939 at Ludwigshafen/Rhein.

..... (Page 25 of the original)

13) Sulphuric Acid from Gypsum in Western Germany.

The preliminary examination of the suggestion by the Reichs-
stelle for Economic Expansion to erect in Western Germany plants
for sulphuric acid from gypsum has shown that that would prove
uneconomical in every respect in view of the favorable supply
of pyrites.

This is to certify to the correctness of the above excerpt.

Nurnberg, 23 March 1948.

signed: Wolfgang NEUBERGER,
Attorney-at-Law.

Copy

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT
LUDWIGSHAFEN-RHINE.

Via Message Center II.

to Herr Government Councillor Dr. MURK,

Reich Ministry of War,

Berlin W 35

Tir,itzufer 72 - 75.

Inorganic Department 29 Nov. 1937
W/S.

Subject: Storage of Pyrites.

Dear Herr Government Councillor,

Today, we learned from the Duisburg Copper Foundry, Duisburg, that a directive has been or is to be published according to which the stock of pyrites at Ludwigshafen, at present amounting to approximately a 5 1/2 months' supply, is to be reduced to only a 3 months' supply and in this way that no more shipments will be made here until the stock has dropped to a 3 months' supply.

We were surprised by this information inasmuch as we were urgently requested, when we imported the surplus of pyrites from Spain, to do everything possible to make the import possible. We did this by

1) enlarging our stores at our own cost, costing us ca.

RM 200.000.—

2) starting, as the first, especially at Ludwigshafen, large-scale systematic experiments on the storage of pyrites in open air.

We are employing the most varied means, trying to prevent a reduction in value of the pyrites, in order to gather in this way information, also for other firms, on how to store the pyrites with the least possible expenditure for warehouses.

(page 2 of original)

Dr. THIERER and Regierungsbaumeister PAJKEK were able to inform themselves on these experiments during their visit to Ludwigshafen on 25 October 1937.

The whole cost for the construction of an open-air-storage-site (concrete floor, quantitative collection of possible alkaline solutions of copper, etc.) would have been in vain, if the pyrites are now shipped from here. It would be even more more regrettable to stop the large-scale experiments just now when we are passing into the most interesting period, i.e. winter and the rainy period of spring. Actually, we have of course no interest, as far as business is concerned, to incur additional costs for storage rentals by storing excessively large quantities of pyrites. We would however regret it exceedingly, from a practical point of view, if the experiments, once begun, would have to be stopped at the present stage, all efforts having been spent in vain; quite apart from the fact that then we could not have all the costs for storage site and storage experiments resting on us, but would have to ask for subsidies.

We beg to have the matter considered from this angle again, desisting for the time being from taking the steps planned.

HEIL HITLER !

I.G. FARBENINDUSTRIE AGTIEGESSELLSCHAFT.

signed: MEHNER. signed: TUNSTER.

Copy to:

Herr Dr. UNGEWITTER,
Control Office "Chemie", Berlin.

Duisburger Copper Foundry, Duisburg.

Excerpt from Prosecution Doc. No. NI-6849, Exh. No. 749, Doc. B, 40
Page 9 of the original.

Berlin W 35, 21 December 1937

Tirpitzufer 72-76

Telephone: 24 81 91

Secret.

1. This is a State secret in the meaning of Article 88 of the Reich Criminal Code.
2. To be passed on in closed envelope only, and to be registered when sent by mail.
3. To be kept under lock and key at the responsibility of the addressee.

I.G. Farben.

Herr Director Dr. Wurster

LUDWIGSHAFEN RHINE

via Communication Center West (Vermittlungsstelle W)

Berlin W 6

Unter den Linden 78.

Reference: Inorganic Dept., letter of 29 November 1937 W/3/

Subject: Storage of pyrites.

The order of the Central Office Chemistry under which the pyrite stores in Ludwigshafen are to be diminished, was initiated here. As Ludwigshafen is situated in an endangered border area, it is incompatible with military economy to store pyrites there in a quantity which exceeds actual storage by far. The order of the Central Office Chemistry does not aim at the removal of the pyrite from Ludwigshafen and no respective steps are taken in this respect, but at the gradual reduction of stores to that quantity which was necessary there for the continuation of production before the increased storage was started. But above all an additional increase of stores is to be prevented.

In our opinion, the storage experiments undertaken by your plant can be carried out by some other I.G. plant quite as well. But the Reich War Ministry has no objections to experiments in Ludwigshafen on quantities which are in excess of the normal storage.

(Page 1* of the original)

by a total amount of 10 000 tons.

As per direction

(signed): signature

Regierungsrat and Gruppenleiter

The correctness of the above excerpt is attested to.

Munich, 23 March 1948.

(Signed): Dr. Wolfgang Heintzeler

Attorney-at-law.

I. G. F.

I.G. Farbenindustrie Aktiengesellschaft
Central Finance Administration
Berlin NW 7

Files - Memorandum.

Import of pyrite from White-Spain.

Export meeting 26 July 1937
Kv/Hs.

The Duisburg copper foundry, with the support of the Rowak, is at present conducting negotiations in London for the import of pyrite to Germany from National Spain. About this, we receive the following information from Messrs. Dr. KISSEL and KISTENEICH:

Delivery contracts are being prepared with the seven Spanish mines below listed for a period of 2½ years, beginning from 1 July 1937, which contracts provide for the import of approximately 1,2 million tons of pyrite per annum.

Handwritten
remarks
illegible

A definite agreement has already been concluded with the mine "Tharsis" whilst the negotiations with RIOTINTO could not be concluded so far. The delay in the negotiations with RIOTINTO is due to the fact that RIOTINTO has requested the Spanish National Government, which has to approve these sales contracts, that it be paid 40% of its entire world export in pyrites in free foreign exchange, whilst THARSIS only wants free foreign exchange for 20% of their world sales. Hence, a delivery agreement with RIOTINTO can be finally obtained only when RIOTINTO has come to terms with the Spanish National Government on this contested point.

Approximately 75% of the entire pyrite deliveries are intended for the I.G., resp. Duisburg copper foundry.

(Page 2 of original)

Seven Spanish mines will share in the delivery of the total amount according to the following provisional scheme of distribution:

Deliveries 1937:	RIOTINTO	210 000 tons
	THARSIS	130 000 tons
	PERUVAL	60 000 tons
Deliveries 1938:	RIOTINTO	420 000 - 480 000 tons
	THARSIS	250 000 - 300 000 tons
	PERUVAL	100 000 - 135 000 tons

The remaining amounts will be delivered individually by Penn, San Platon, Esperanza and a mine the name of which has not been mentioned to us.

The price amounts to approximately RM 20.- per ton until port of destination on Rhine, resp. Elbe; this price corresponds roughly to a fob-value of RM 11.- to 12.-. The basis for the price is British.

Business will be carried out through the organization Rowak/Hispa for the time being, but it was provided in the agreement that, as soon as normal economic conditions are re-established, payment will be made by way of a German-Spanish clearing which might possibly be newly established.

The trusteeship fee of the Hispa is 1%, that of the Rowak 1½%. Negotiations as to a rebate of the fee are still in progress.

This delivery agreement of about 1,2 million tons per annum falls on present German need of about 700 000 tons per year so that, with the import of the entire agreed amount of pyrite, also a substantial supply will be built up. Considering also the very important German deliveries to Spain, the German authorities advocate the highest possible import of pyrite in order to reach in this way a speedy payment of already delivered German exports.

Section Export boosting
signed signature.

(page 3 of original)

Distribution:

Director Dr. ILGNER	Zoffi, Berlin
Director Dr. KNEGER	" "
Director Dr. FRANK-PAHL	" "
Dr. EILFERT	" "
Dr. GATTINEAU	" "
Director REISS	Bayerns Dep. Lu.
Director RIEGER	Nitrogen Syndicate, Berlin.

Copy

I.G. Ludwigshafen
Inorganic division.

File note.

Inorganic division, 12 July 1937
7/8

Subject: Additional storing of pyrites.

Conference in Frankfurt on the Main on 2 July 1937

Present were: Director DENCKER,
Director Dr. KISSEL,
Director Dr. MURSTER.

Probable intake of 3 mill. tons of Spanish gravel.
Value: RM 20 per ton, i.e. RM 50 mill. of this we are
to take over 80 %. The store of 1 mill. tons of gravel
thus created is then to be got rid of over a period
of 5 years, at the rate of 200,000 tons per year, by
way of only accepting future contracts involving more
than 400,000 tons per year. The calculation shows
that assuming 5% interest and average additional storage
costs of RM 2.- per ton, there will arise until
1945 RM 5.76 mill. interest and RM 2.4 mill. storage
costs, a total cost of RM 8.16 mill., corresponding to
RM 6.30 per ton of gravel. This would result in an
increase in price of RM 1.50 per 100 kg S, i.e. 50%
(11), which would be an intolerable burden.

Therefore DENCKER and MURSTER proposed the
following:

Of the 3 mill. tons of gravel to be taken in
300 000 tons represent the "normal", i.e. the exten-
sion of supply for one year. This leaves 2.7 mill.
tons of gravel to be distributed, of which I.G.
Copper mining could take 50%, i.e. 1.32 mill. tons
of RM 32 mill. in value. This would result in 1.92
mill. RM interest by the end of 1939, and, by the
end of the distribution,

Document Book II URSTER
URSTER Doc. No. 7 560
Exh. No.

(Page 2 of original)

(120 000 tons per year), this would result in a total of M 2,8 mill. interest and M 1,4 mill. storage costs, so the total costs would amount to M 4,2 mill. For the sake of securing the raw material position this burden seems more or less bearable.

signed :

Handwritten notes in the margin and at bottom of document illegible.

EXCERPT

from the minutes of the Conference of inorganic chemistry experts
on 30 June 1939 in Leverkusen.

p. 3

WURSTER

The stocks of pyrites in the I.G. have shrunk to approximately
half a year's supply.

This is a certified true excerpt:

Munich, 20 March 1945

Signature: Dr. Wolfgang HEINTZLER
Attorney-at-Law.

Excerpt from the minutes of the 48th Conference of the Chemicals-
Committee in Berlin on Saturday, 4 December 1937.

.....

.....

The ICI, who in Billingham produce sulphuric acid from gypsum according to our process and who maintains to have substantially improved this process, but, according to our license agreement, is not a partner in licenses granted to third parties, has proposed a change of contract in their favor. The Chemia decided to share out one third of the incoming license fees to the ICI in cases in which they bring us licensing opportunities.

In this connection Dr. ter ^{sections}MEER/his visit to St. COLIN, made together with Herr von SCHNITZLER during the "Chemistry Week" in Paris. In the discussion which took place, St. COLIN showed interest in our process of producing sulphuric acid from gypsum, owing to the uncertainty of pyrite supply during the Spanish civil war; besides, they also were interested in possibly collaborating with us in other fields. The firm gives the impression of being very backward technically and intending to bring their obsolete manufacturing methods up-to date. Dr. WURSTER has been commissioned to find out by negotiations the possibility of technical assistance.

.....

.....

I certified true excerpt:
Nurnberg, 23 March 1948.

signed: Wolfgang HEINTZLER,
Attorney-at-Law.

EXCERPT from the minutes on the meeting of TEL on Wednesday,
25 January 1939 at 0930 a.m. in Berlin.

V. Miscellaneous.

2.) Negotiations with St. Gobain.

Several gentlemen from St. Gobain have been on a week's trip through German SO₂ - Contact Plants erected by the I.G. and the Lurgi, and have been extremely impressed by their trip. St. Gobain has decided to install a fair-sized revolving tube furnace (Drehrohröfen) and of SO₂-Contact furnaces, which would be an indication of a certain forthcoming collaboration in the field of inorganic chemistry.

I, certified true excerpt.

Nuremberg, 20 March 1948.

Signature: Dr. Wolfgang HEINTZLER,
Attorney-at-Law.

EXCERPT from the minutes of the conference of inorganic chemistry
experts in Leipzig on 5 April 1939.

.....

"5 April 1939 FURSTER reports on foreign plants and plans;
in this connection it is of particular interest
that the negotiations with St. Gobain have good
prospects of success despite the present political
difficulties.

.....

A certified true excerpt:

Nuernberg,

Signature: Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Copy

Document Book II WURSTER
Document WURSTER No. 501
Exhibit No.

The Chief

of the INDUSTRIAL GROUP CHEMICAL INDUSTRY, as Commissioner for
Production, of the Reich Minister for Armament and War Production

Berlin W 35, 28 January 1944
Sigismundstrasse 6
Telephone: 227561
Telegram address: "Alchimie"

Official Pass

By virtue of the powers delegated to me by the Herr Reich
Minister for Armament and War Production, as per letter of
11 January 1944, I have commissioned

Herr Dr. Carl WURSTER

Chief of the Fachgruppe Sulphur and Sulphur Compounds in the
Industrial Group Chemical Industries.

This pass becomes invalid on receipt of the grey pass which
has been applied for and already promised by the Reich Minister
for Armament and War Production.

The Chief of the Industrial Group Chemical
Industries, as Commissioner for Production,
of the Reich Minister for Armament and War
Production

signed: Signature

Copy

Document Book II WURSTER
Document WURSTER No. 501
Exhibit No.

The Chief

of the INDUSTRIAL GROUP CHEMICAL INDUSTRY, as Commissioner for
Production, of the Reich Minister for Armament and War Production

Berlin W 35, 28 January 1944
Sigismundstrasse 6
Telephone: 227561
Telegram address: "Alchimie"

Official Pass

By virtue of the powers delegated to me by the Herr Reich
Minister for Armament and War Production, as per letter of
11 January 1944, I have commissioned

Herr Dr. Carl WURSTER

Chief of the Fachgruppe Sulphur and Sulphur Compounds in the
Industrial Group Chemical Industries.

This pass becomes invalid on receipt of the gray pass which
has been applied for and already promised by the Reich Minister
for Armament and War Production.

The Chief of the Industrial Group Chemical
Industries, as Commissioner for Production,
of the Reich Minister for Armament and War
Production

signed: Signature

Copy.

AFFIDAVIT

I, the undersigned merchant Hermann SCHUSTER, born on 12 August 1895, residing in Ludwigshafen/Rhine, Schuckertstrasse 37, have been warned that I render myself liable to punishment if I make a false affidavit. I declare upon oath that my affidavit is true and was made to be submitted as evidence, in case VI, to the Military Tribunal in the Palace of Justice, Hamburg, Germany.

1. In 1912 I entered the service of the AGFA, one of the constituent companies of the I.G.. Since 1925, I was in charge of the sale of sulphuric acid in Central Germany; since 1935, I fairly regularly attended the Sulfur-Uke meetings of the I.G., and since 1939 I have been working in the so-called Sulfuric Acid Office in Berlin, which was a distribution center for sulphuric acid, and, after the establishment, in 1943, of the sub-section (Fachgruppe) Sulphur and Sulphates within the economy group of Chemical Industry, I became the manager and recorder of this sub-section.

For these reasons I am fully conversant with all commercial and organizational questions in the field of sulphuric acid and related products, and I have known Herr Dr. WURSTER since 1931.

2. After Herr Dr. WURSTER had been officially appointed as chief of the sub-section Sulphur and Sulphates early in 1944, I could closely watch his activities in this field in my capacity as manager of this sub-section.

This sub-section was a link in the self-administrative organization of the German economy. Its task at that time was to submit, on the basis of the practical experience of industrial circles, workable suggestions to the government offices which were charged with the control of production and consumption. Only two sub-section conferences took place, according to my data, while Dr. WURSTER was chief of the sub-section, viz., on 1 February 1944 and on 15 June 1944. During this period Herr Dr. WURSTER discharged his functions in a strictly professional and objective manner; his attitude was - shall I say - markedly after 15 June 1944. It was in tune with his basic attitude to be absent from Ludwigshafen as little as possible with the increasing fierceness of the air-raid against the plant in his charge, in order to concentrate on the care of the plant staff who were sorely afflicted at that time.

3. It is well known to me that, in 1943, Berlin offices had evolved a plan of appointing so-called "Expert Delegates" of the "Gebehoemie" (Plenipotentiary for Chemical Matters) to various districts. According to this plan, Herr Dr. WURSTER's appointment to the position of Expert Delegate of the group Sulphur, Sulphuric Acid and related products had been envisaged at first. At that time, Herr Dr. WURSTER pointed out to me that he saw no necessity of appointing an "Expert Delegate" beside the sub-section which was then being set-up. For this reason,

Herr Dr. WURSTEL never became an Expert Delegate of the "Gobachemie". On the contrary, I remember that, at the meetings of the sub-section Sulphur and Sulphates, the interests of the "Gobachem" were always taken care of by Oberregierungsrat Dr. POHLAND, the full-time representative of the Gobachem in the field of inorganic chemistry. He was always invited to the meetings of the sub-section and attended the conferences.

Ludwigshafen/Rhine, 27 January 1948.

signed: Hermann SCHUSTER

The foregoing signature of Herr Hermann SCHUSTER, made before me, Dr. Wolfgang Reintzeler, Ludwigshafen/Rhine, is certified herewith and attested to by me.

Ludwigshafen/Rhine, 27 January 1948

signed: Dr. Wolfgang REINTZELER

Attorney-at-Law.

Cont

AFFIDAVIT

I, the undersigned Dr. POHLAND, residing in Minden/Westphalia, Steinstrasse 20 b, have been warned that I render myself liable to punishment if I make a false affidavit. I declare upon oath that my affidavit is true and was made to be submitted as evidence to the Military Tribunal in the Palace of Justice, Nurnberg, Germany.

1. From 1937 to 1947, I was a "Referent" with the Plenipotentiary for Special Problems of Chemical Production.
2. I have been informed that the Prosecution, in the Nurnber I.G. case, has presented, as Document NI-5934, Exh.475, a roster of all the expert delegates of the "Gebochen" as per 1 April 1943, and that Dr. WURSTER was quoted in this roster as the expert delegate in the field of smoke agents, plants for various inorganic productions and Sulphuric acid and Sulphates.
3. From my activity as Referent with the Gebochen I know that an agreement was reached early in 1943 between the Reich Ministry for Economy and the Gebochen, according to which Expert Delegates of the Gebochen were to be appointed for certain fields of chemical production, and I know that these expert delegates of the Gebochen were to be, at the same time, the heads of the technical committees

of the respective sub-section of the economy group of Chemical Industry. This personal union was intended to prevent frictions and duplication.

4. The assignment of the aforesaid Export Delegates of the Gobechem was not put into practice - at least not with respect to the inorganic chemistry sector which I could survey myself. For this reason, Herr Dr. WURSTER, in his later capacity as head of the sub-section Salts and Sulphates within the economy group of "Chemical Industry" as well as in his later capacity as head of the working committee for works-agents, always invited me to attend all meetings, as I was the appropriate representative of the Gobechem, and always regarded me as the delegate of the Gobechem.

5. Furthermore, I know from my activity as the informant of the Gobechem that Herr Dr. WURSTER had never any function with the Reich Office for Economic Expansion or with the Gobechem other than that of an honorary technical adviser. As honorary adviser he had no authority whatever to act for authority the Reich Office for Economic Expansion or the Office of the Gobechem, and, therefore, of passing any decisions on his own.

Minden/Westphalia, 2 January 1948.

signed: Dr. Emil POHLAND

The foregoing signature of Herr Dr. Emil POHLAND, Minden/Westphalia, Steinstrasse 20 b, made before me, Attorney-at-Law F.W. WAGNER, Ludwigshafen/Rhine, Schiffbaustrasse 32, is certified herewith and attested by me.

signed: F.W. WAGNER

Attorney-at-Law.

EXCERPT
from the
General Circular
(formerly General Information)
of the

ECONOMY GROUP "CHEMICAL INDUSTRY"

Berlin W 35, Sigismundstrasse 3, Telephone No. 32 75 51, Tel. Cable
Address "Alchimie"

NOVEMBER 1944

SPECIAL COPY (Reprinted)

To all member firms.

Many supplementations and adjustments which had become necessary
in practice took place in the organization of the economy group
Chemical Industry since the last publication (special copy December
1943/March 1944).

For this reason, you will find hereinbelow a survey of the
organization of the Economy Group "Chemical Industry" (as of
November).

.....

Presidium:

H. SCHLOSSER, Chairman of the Presidium.

Dr. F. tor MEER, I.G. Farben, (16) Frankfurt/Main.

Dipl.-Ing. R. E. DORR, Farbwerke G.m.b.H. (24) Hamburg.

L. M. KLÜFTINGER, Messrs. Goodrich & Co. G.m.b.H., Chemical Works.

(3) Teltow-Berlin, Elbstrasse.

Dr. H. KLOPP, Vaseol Werke, K.G. (10) Leipzig C 1, Hillerstr. 4

Prof. Dr. Ing. F. MARTIN, Ruhrchemie A.G., (22) Oberhausen-Holten.

Dr. Ing. HAMSTETTER, Deutsche Solvay Werke A.G.

(19) Wostorregeln plant, district of Magdeburg.

Dr. H. RICHTER, Messrs. HENKEL and Co., A.G. and G.m.b.H.

(22) Düsseldorf.

Dr. O. UNKOWITZ, Economy Group "Chemical Industry", (1) Berlin.

.....

Copy

AFFIDAVIT

I herewith confirm that Herr Dr. Carl WURSTER, Ludwigshafen, who was appointed as chief of the sub-section "Sulphur and Sulphates" by the Economy Group "Chemical Industry" in 1944, has never been a member of the Presidium of the Economy Group "Chemical Industry".

I, Hermann SCHLOSSEK, born on 8 October 1899, residing at present in Hof Eich near Gelnhausen, have been warned that I render myself liable to punishment if I make a false affidavit. I declare upon oath that my affidavit is true and was made to be submitted as evidence in case VI to the Military Tribunal in the Palace of Justice, Murnberg, Germany.

Frankfurt/Main 23 September 1947.

signed: Hermann SCHLOSSEK.

No. 492 of the document roll of 1947.

The foregoing signature of Herr Director Hermann SCHLOSSEK, residing in Hof Eich near Gelnhausen, is officially certified herewith.

Frankfurt/Main, 23 September 1947.

signed: Dr. BARE, Notary

(Seal)

Dr. Carl Hans BARE
Notary in Frankfurt

Costs: Unspecified Value	
Fees: under Article 39 of the	
Reich Cost Regulations:	RM 2.--
Sales tax 3 %	" - .06
	<u>RM 2.06</u>

signed: Dr. BARE
Notary

Copy

A F F I D A V I T

I, the undersigned Hans MORGENTHAUER, born 30 March 1900, resident of Ludwigshafen an Rhein, Siemensstrasse 6, have been cautioned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement corresponds to the truth and was made to be submitted as evidence to the Military Tribunal in the Palace of Justice, Nuremberg, Germany (Case VI.)

Since 1916 I have been a member of the staff of the Badische Anilin- & Soda-Fabrik and since January 1938 I have worked as a secretary to Herr Dr. WURSTER who became at that time a member of the Vorstand and works manager of the Ludwigshafen-Opau plant. In this capacity I received the very extensive mail addressed to Herr Dr. WURSTER, which, according to its importance, I then submitted to him personally or forwarded directly to the offices in charge of the particular subject. Thus I can remember that the letter from Dr. F. A. KERTESS, 551 Fifth Avenue, New York, N.Y., dated 13 September 1939, a copy of which has been produced under Document No NI-5773, Exh. 1028, was received at Ludwigshafen in the autumn of 1939. I remember the letter particularly well because I, being opposed to any war in every respect, read with horror in its first paragraph that in case of a prolonged duration of the war the entry of the USA into the war had to be expected, the experiences in the war of 1914-18 reminding me of all the terrible consequences which would result for Germany in such an event. As for the contents of the letter itself

(page 2 of original)

I can state that the subject in question did not fall within the competency of Herr Dr. MURSTER so that he did not know what he should do with this surprising letter. Therefore, the letter was neither dealt with nor answered by Dr. MURSTER, but, as far as I remember, was forwarded to the Central Finance Office of the I.G. in Berlin NW 7 for further action.

Ludwigshafen-on-Rhine, 15 December 1947.

signed: Hans BORDENTHALER

I certify that the above signature is that of Herr Hans BORDENTHALER, signed before me, F. J. WILSON, attorney-at-law,

Ludwigshafen-on-Rhine, Schleeshausstrasse 32.

Ludwigshafen-on-Rhine, 15 December 1947.

signed: F. J. WILSON

attorney-at-law,

A F F I D A V I T

I, the undersigned Dr. Erich POHLAND, Referent in the chemical section of the Administration for Economy, Minden/Hoechst, born on 7 June 1898 in Albersfeld, resident of Minden in Westphalia, Steinstrasse 20 b, have been cautioned that any false affidavit is punishable, that I have to speak the truth and that my affidavit is to be submitted as evidence to the American Military Tribunal in the Palace of Justice, Nuremberg, Germany (Case VI).

1.) From 1939 until 1945 I worked as a section chief for inorganic chemistry at the Reichsstelle fuer Wirtschaftsausbau (National Office for Economic Structure), later Reichsausschuss fuer Wirtschaftsausbau.

2.) At the bidding of the Reich Ministry of Economics, to whom my agency was subordinate, my agency had to get towards the end of October 1939 a picture of the situation of certain chemical industries in Poland. My agency gave my name to the Ministry of Economics for the inspection of several plants in Poland and, accordingly, I made an inspection tour to Poland towards the end of October/beginning of November 1939. It is known to me that, within the framework of the same action on the part of the Reich-Ministry of Economics, a number of other government officials made inspection tours to Poland around the same date.

3.) In order to facilitate my task I asked Herr Dr. URSTER to accompany me on my journey as an expert. At the same time I asked him to place at my disposal a motor car with driver and an interpreter, as my own car had already been requisitioned and my agency had only very few cars at its disposal.

(page 2 of original)

In asking Dr. WURSTER to accompany me as an expert, my secondary aim had been thus to be able to use his car and driver. Notwithstanding all the heavy business claims on his time, Herr Dr. WURSTER agreed, pointing out that, as the manager of a big plant that was particularly exposed to air attacks, he was interested in becoming acquainted with the effects of air raids on chemical plants; from the experiences made there he wanted to learn how to protect his own plant and staff in the case of possible air raids. That I asked Dr. WURSTER to accompany me in this way was by no means anything unusual; it is well known to me that also other government officials, who made inspection tours to Poland within the scope of this action, took practitioners of industry as experts along with them, and not only men of the I.G., but, for example, also men of the Solvay-Werke.

4.) The inspection tour lasted five days. From the Document No. NI-1149, which was shown to me, I take that the journey took place between 26 October and 11 November 1939. I remember that we attained a very high mileage daily because Dr. WURSTER was pressing very much for the return home, and that I paid tribute to the driver for his performance. In the course of the inspection of the individual plants I primarily gathered general data of the plant inspected each time, while Dr. WURSTER was to ascertain technical details. On the strength of his professional knowledge, Dr. WURSTER had no difficulties in finding out, quickly and analytically, details of works installations.

(page 3 of original)

5.) At each of the plants inspected short notes were taken in what condition the plant was found and what technical possibilities resulted for us. Today, after about 8 years, I cannot remember with certainty what happened after this journey to Poland, the less so since all my files were completely destroyed by the events of the war. The notes by Herr Dr. WURSTER contained in Document No. NI-1149 strike me as entirely unknown to me. I do not think that I ever received them. If I did receive a report at all, it would have been in accordance with my habit if I had made from it a brief, concentrated representation, using in addition my own notes for this purpose, and forwarded it to the superiors of my agency or to the Reich Ministry of Economics. Neither do I think that I myself compiled a report on the trip or forwarded it to my superiors in office or to the Reich Ministry of Economics. It is very probable that all this proved unnecessary because around that time the decree of the Fuhrer concerning the administration of the occupied Polish territories was published, placing the entire administration of the occupied Polish territories under a Governor General who was directly responsible to HITLER. Thus both the Reich Ministry of Economics and the National Office for Economic Structure were excluded from this field and it is fair to assume that none of the Berlin agencies was interested in a report on my journey any longer. My journey, then, was outdated by the events and thus immaterial already at the moment when it was undertaken, that is to say by the Fuhrer decree concerning the establishment of the Government General, which seems not to have been known to me at the moment of my departure.

(page 4 of original)

6.) I expressly emphasize that Herr Dr. WURSTER accompanied me on my journey not perhaps in his capacity of representative of the I.G. Farbenindustrie Aktiengesellschaft, but exclusively in his capacity of technical advisor. Then the journey to Poland was over Herr Dr. WURSTER did not have any further dealings with the question of the chemical industry in Poland.

Hoechst, 28 October 1947.

signed: Dr. Erich POHLAND.

I certify that the above signature is that of Herr Dr. Erich POHLAND, signed before me, Friedrich Wilhelm TIGNER, Attorney-at-Law.

Hoechst, 28 October 1947.

signed: F. W. TIGNER
Attorney-at-Law.

Dr. Botho MULERT

of the

Administration for Economy
of the United Economic Areas

Frankfurt, 20 March 1948
Telephone: 13961 Extension 184.

Affidavit

I, the undersigned Dr. Botho MULERT, born on 15 March 1883 in Canditten, resident of Frankfurt-Sindlingen, Gustav Allee 6, have been cautioned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement corresponds to the truth and was made to be submitted as evidence to the Military Tribunal in the Palace of Justice, Nuernberg, Germany, Case VI.

1.) From 1922 to 1944 I was an official of the Reich Ministry of Economics, holding from 1938 onwards the rank of a deputy ministerial director. In the period from 1938 to 1944 I was in charge of the Section for Chemistry. At present I am employed at the Administration for Economy at Frankfurt-Heeschst.

2.) I do not recollect ever having seen a report by Herr Dr. WURSTER on the journey to Poland which he made towards the end of October 1939 as a companion and technical adviser of Herr Dr. POHLAND. It is not known to me that such a report by Dr. WURSTER was received at my then office. If such a report had been received at my then office I would have been bound to know about it.

Frankfurt, 20 March 1948

signed: Dr. Botho MULERT

(page 2 of original)

No. 115 of the 1948 Document Roll.

I herewith certify that Herr Dr. Botho VALENT, Frankfurt-Sindlingen, Gustav Allee 6, who has proved his identity by producing his identity card, appended the foregoing signature before me.

Frankfurt am Main - Roostat, 20 March 1948

signed: Signature

Notary

Rubber stamp: Dr. Josef NIXE, Notary at Frankfurt/Main.

Costs:

Value: minimum value

1.)	Fee Art. 39 of the RKO	RM 2.--
2.)	Sales tax	RM -.06
		<u>RM 2.06</u>

signed: Signature
Notary

I certify that this is a literal and complete copy of the above document.

Nuernberg, 24 March 1948

signed: Dr. Wolfgang HEINTZELER
Attorney-at-law

Copy

Affidavit

I, the undersigned, Dr. Kurt HOHNIS, born on 9 May 1891 at Sosnowiec (Poland), residing at Frankfurt a. M. - Hoechst, Peter-Siedstrasse 4, have been told that I render myself liable to punishment if I make a false affidavit, that I must tell the truth and that my affidavit will be submitted as evidence to the American Military Tribunal in the Palace of Justice in Muenberg, in Case VI.

In 1936 I entered the employ of the I. G. Farbenindustrie A.G. as a chemist in the Hoechst-Works. At the end of 1939 Director Dr. WURSTER from the Badische Anilin- & Soda-Fabrik, Ludwigshafen requested from the Hoechst Farben Works an interpreter of the Polish language for a short trip to Poland. As I am in full command of the Polish language in speaking and in writing I was put at Director Dr. WURSTER's disposal as an interpreter. I myself was in no way informed about the purpose of the trip but served solely as an interpreter. If it says in the Prosecution documents that this trip allegedly was made from 26 October 1939 until 1 November 1939, this seems to be correct as far as I remember. I know for sure that it was at the end of October and the beginning of November. Before I made the trip to Poland I did not know Director Dr. WURSTER. However, he attracted my attention very soon by his particularly genuine amiability and quite soon I found out

(page 2 of original)

that he is a sincere, openhearted and kind person. As a human trait of his character I do not want to fail in reporting the following:

When we were forced to stop at some small place where we had to spend the night under very primitive conditions with only one bed available, he refused to sleep in this bed and gave me no peace until I accepted the bed, saying that I am the older one and he the younger, and that he as the younger one could stand this inconvenience much better than I being older. He then slept in some kind of an emergency bed.

Herr Director WURSTER was very much interested in the country and the people of Poland and in their manners and customs. Several times he spoke to me of his sympathy for this country, towards which one ought to be especially considerate, because this country by losing a war had been overcome by a national misfortune. Therefore he demanded that we talked courteously and sympathetically to those of the population with whom we got into contact.

I remember the following incident. We sat in an exclusive restaurant in Lodz and I made the remark to Dr. WURSTER that this restaurant was almost empty and that actually only Germans were there as guests.

(page 3 of original)

Thereupon Dr. WURSTER replied: hats off to the Poles that they do not go to places of entertainment during the time of their national distress.

Dr. WURSTER and I also talked about social conditions of the workers in Poland and it struck him especially to see the submissive attitude of these workers towards their employers, because he, as he told me every time, tried to establish modern social installations ⁱⁿ his plant. I believe that in this connection I told Dr. WURSTER that it was due to this submissive attitude of the greater part of the Polish workers that they talked of their employers as of their "masters".

If Dr. WURSTER is being reproached for having expressed anti-semitic feelings, I can only point to the following event which occurred during my trip with him to Poland:

In the course of our talks we once broached the Jew Programs and the destruction of the synagogues in 1938. Dr. WURSTER expressed his disgust about that and said that this was vandalism and that it was unworthy of the German people.

On our trip we inspected a plant manufacturing artificial silk. One manager of this plant manufacturing artificial silk, a Dr. POZNANSKI,

(page 4 of original)

was, as we found out, a Jew. On the basis of my knowledge of the Polish conditions I knew that because of the anti-semitism prevailing in Poland it happened very seldom that a Jew occupied a leading position in a Polish enterprise and I therefore expressed my surprise to Dr. WURSTER. Dr. WURSTER thereupon replied at once that it did not matter whether this man was a Jew; the main thing was that he was an efficient person and that he did a good job in his field of work, and apart from that this man made a nice impression on him. Dr. WURSTER even made most of his negotiations with this Dr. POZYNSKI.

Mannheim, 21 November 1947.

signed: Dr. Kurt HOLTKIS

I herewith certify and testify that the signature of Herr Dr. Kurt HOLTKIS was made before me to-day.

Mannheim, 21 November 1947

signed: F. W. WACHNER

Attorney-at-law

Copy

AFFIDAVIT

I, the undersigned Dr. Walther DECKER, born on 5 September 1906 in Trier, resident of Saarbrücken, Neugraboweg 18, am aware that I render myself liable to punishment if I make a false affidavit, that I must speak the truth and that my affidavit will be submitted as evidence to the American Military Tribunal in the Palace of Justice, Nuernberg, Germany (Case No.VI).

- 1.) From 1941 to 1945 I was manager of the former Economic Chamber Westmark in Saarbrücken and in the period from June to December 1940 I worked temporarily at the office of the Chief of the Civil Administration for Lorraine at Metz.
- 2.) Starting in the autumn of 1940 negotiations took place at the office of the Chief of the Civil Administration in Metz dealing with the restarting of an oxygen plant at Diedenhofen in Lorraine, to supply the economy of this area, which was very short of oxygen for welding purposes. I know of these negotiations in broad outlines and remember them very distinctly as I myself conducted them at the beginning.
- 3.) I can confirm that Herr Dr. WURSTER himself did not participate in these negotiations.
- 4.) On the instigation of the office of the Chief of the Civil Administration, Herr Dr. WURSTER was at the beginning of October 1940 at Metz, because the Gauleiter and Chief of the Civil Administration wanted the I.G. Farbenindustrie Aktiengesellschaft to acquire the Douse plant of the Etablissement Kuhlmann S.A. Paris. The Chief of the Civil Administration wished that the

I.G. Farbenindustrie A.G. should make of this plant a so-called model-plant. I remember very clearly that in the course of these negotiations Dr. WURSTER strongly opposed the acquisition of this plant by the I.G. so that subsequently the I.G. did not come to acquire an interest in this plant.

- 5.) After this conference I went - as far as I remember - with Dr. WURSTER for lunch to a restaurant in Metz where we chanced to meet one Herr KALBFLEISCH of the United Oxygen Plants Berlin who was negotiating on that day with another gentleman of the Metz office - on orders and in behalf of the United Oxygen Plants -, the restarting of oxygen plants in Lorraine. He came to our table and talked about the matter in broad outlines.
- 6.) I know for certain that Herr Dr. WURSTER was not a partner in these negotiations concerning the lease of an oxygen plant at Diedenhofen.

Saarbrücken, 19 March 1948

signed: Dr. Walther DECKER

I certify the authenticity of the foregoing signature of Dr. Walter DECKER.

(Seal) signed: Signature

Government Councillor

Certificate of Translation

1 April 1948

We hereby certify that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of Document Book II WURSTER.

Hanna Maria BIEBER, Civ. No. B-397 989, (pages 62-63)

.....

Hildegard L. FIRTZ, Civ. No. 17 415, (pages 57-61; 64-67; 77-84)

.....

Gerhard FISCHER, Civ. No. 17 397, (Certificate, pages 1-16)

.....

Rosal GETZEL, Civ. No. 45 672, (Cover; Index; pages 38-42)

.....

Paul E. GROPP, Civ. No. B-397 975, (pages 85-88)

.....

Hans NICHTENHAUSER, Civ. No. 20 113, (pages 62-63)

.....

Alfred OBERLANDER, Civ. No. 20 192, (pages 17-31; 69-76)

.....

Continuation of Certificate of Translation

1 April 1948

We hereby certify that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of Document Book II "URSTER."

Ursula E. RUTMAN, Civ. No. 20 130, (pages 32-37)

.....

Kurt SCHREIER, Civ. No. 35 299, (pages 43-56; 68; 89-90)

.....

Case 6
Defense

TRIBUNAL VI

CASE V

DOCUMENT VOLUME III

FOR

DR. CARL WURSTER

submitted by the
defense counsels

Friedrich Wilhelm WAGNER

Attorney - at - Law

Dr. Wolfgang HEINTZLER

Attorney - at - Law.

Lang



Case 6
Defense

TRIBUNAL VI

CASE V

DOCUMENT VOLUME III

FOR

DR. CARL WURSTER

submitted by the
defense counsels

Friedrich Wilhelm WAGNER
Attorney - at - Law

Dr. Wolfgang HEINTZLER
Attorney - at - Law.

Tung



Table of contents of Document Volume III

Dr. Carl W U R S T E R, Case VI.

Doc. No.	Exh. No.	Contents	Page
<u>Count III of the indictment.</u>			
<u>Documents giving a general description of the employment of workers from foreign countries in Ludwigshafen/Opfau.</u>			
513		Letter of the Employment Office Ludwigshafen to the I.G. Farben plant Ludwigshafen, dated 5 February 1941, concerning the employment of workers from foreign countries. "I have observed that recently Dutch, Belgian, Luxembourgian as well as Slovakian workers requested to be employed with your plant".	1
512		Letter of the Employment Office Ludwigshafen to the I.G. Farben plant Ludwigshafen, dated 15 December 1941, stating that the French citizen Angele MARSCHAN-DEAU requested the German Labor Allocation Office in Paris to be employed with the I.G. Farben plant Ludwigshafen.	2
568		Contract between the firm Dieu et Allain in Paris and the I.G. Farben plant Ludwigshafen of 20 April 1941 to the effect that the French firm is to transfer 500 workers for assembly work. The conditions laid down in the contract speak for themselves.	3 - 5
593		Excerpt from the minutes of the Directorate Post-conference in Ludwigshafen of 9 May 1942, according to which the first 180 French mechanics (civilian workers) arrived and were taken care of with the assistance of a French engineer.	6
515		Letter of the Ludwigshafen plant to the German Reichsbahn of 28 August 1941. The letter mentions that 15 French workers of the firm Dieu et Allain, Paris, (see Doc. Wurster 568) intended to go on leave to Paris on 27 August 1941 and were not allowed to take a certain express train. The Ludwigshafen plant brought all its influence to bear in order to smooth the way for the French workers.	7 - 8
566		Proclamation of the Ludwigshafen plant management of 22 March 1945 "to the French workers employed in the plant": "up till now we have granted leave to French workers in order to enable them to settle urgent family affairs, as far as the circumstances in the plant made this possible even if they were not yet entitled to leave according to the official German regulations then valid".	9 - 10

Doc. No.	Exh. No.	Contents	Page
510		Letter of the Ludwigshafen plant to the German recruiting office for foreign labor of 24 September 1941, concerning workers from northern France. "We do not consider it expedient to force persons who have broken their contract to resume their place of work here, as we have had the experience that with such persons smooth working is not possible in our plants."	11
220		Affidavit of Otto ECKERT of 9 January 1948. Since 1938 the witness has been chief of the Personnel Department for Workers in the I.G. Farben plant Ludwigshafen. He states that from April 1943 to December 1944 a total of 8,004 foreign workers left the plant.	12 - 14
241		Affidavit of Otto ECKERT of 29 January 1948 (see Doc. Wurster 220) The witness states that the Ludwigshafen-Opau plant throughout the entire war always endeavored to employ chiefly German workers, when covering its labor requirements resulting from state production requirements.	15 - 16
145		Affidavit of Eugen LINZENAY of 21 November 1947. From 1938 to 1945 the witness was chief of the Employment Office Ludwigshafen. During the war a refusal to employ foreign workers by entrepreneurs would have been regarded as an act of sabotage against war production and against the State by the official authorities and would have been punished accordingly.	17-18
254		Affidavit of Dr. Alfred von NAGEL of 29 January 1948. "Already since the end of 1939 the total production of the Ludwigshafen plant was laid down by orders of the state planning offices".	19 - 20
516		Circular letter of the Personnel Department Ludwigshafen, dated 10 June 1942, to the department chiefs of the Ludwigshafen-Opau plant, concerning employment of foreign labor and a list of considerations dated 8 June 1942, which are to be observed in the employment of foreign labor, (excerpt) "The war forces us to employ foreign labor in our plants in order to be able comply with the increasing production requirements".	21 - 26

Doc. No.	Exh. No.	Contents	Page
----------	----------	----------	------

516		"As a general rule it must be stated that the foreigner lays especial stress on just treatment". Our main task in connection with the employment of foreign labor is to find out persons who are obviously unwilling to work and elements endangering discipline and to send them back to their home country immediately".	21 - 26
570		Letter of the Plenipotentiary in the Arrondissement District XII b to the I.G. Farben Ludwigshafen, dated 25 July 1944, which announces an assignment of 1000 Jews from the Eastern territories and which requires housing for these Jews according to concentration camp standards.	27
296		Affidavit of construction manager Carill SANTO of 16 March 1948. The witness describes how he in agreement with Dr. WURSTER after very difficult negotiations, succeeded in avoiding the employment of the 1000 Jews announced in Doc. WURSTER 570.	28 - 29
247		Affidavit of Dipl. Ing. Kurt HOFFMANN of 19 January 1948. During the war the witness was Chief of the Personnel Department Ludwigshafen. He describes that in 1944 1500 female Jewish concentration camp prisoners from Hungary were assigned to the plant and how, in very difficult negotiations, the plant succeeded in avoiding the employment of the prisoners in Ludwigshafen.	30 - 33
7		Illustrated survey on life in the communal camps of the I.G. Farben plant Ludwigshafen, issued towards the end of 1941 (will be specially submitted in limited numbers).	34
288		Affidavit of Valentin WALTER and Dr. Bernhard CYRIAX of 11 March 1948 for the purpose of identifying Doc. Wurster No. 7	35 - 36
6		Affidavit of Oberingenieur Kurt HOFFMANN, Karl SCHMID and Albert HUELTER of 2 March 1948 for the purpose of identifying the collection of "pictures on the life of the workers from foreign countries in the communal camps of the I.G. Farben plant Ludwigshafen/Oppau during World War II", attached as an appendix. (The appendix is to be submitted specially in limited numbers).	37 - 40
330		Affidavit Vock	40A-40B

Doc. No.	Exh. No.	Contents	Page
----------	----------	----------	------

Documents concerning Dr. WURSTER's attitude towards social problems, especially towards that of foreign labor.

- 289 Affidavit of Oberregierungsrat Dr. Helmut STURN of 31 January 1948. During the war the witness was the official in charge with the labor trustee in Saarbruecken, who was competent for Ludwigshafen and at present he is referent in the Ministry of Labor of Wuertemberg-Baden in Stuttgart (US Zone). He often carried on discussions with Dr. WURSTER. He was surprised that social questions were of Dr. WURSTER's special interest, whereas other plant leaders were mainly interested in commercial and technical questions. "Dr. WURSTER made all decisions dealing with the workers and employees of the plant on the basis of a profound social and humane attitude."
 ".....as a plant leader he took care of the workers from foreign countries especially considering their separation from their family and home country."
 The witness further substantiated his view by referring to several incidents, especially to a thorough inspection of the foreigner's quarters in Ludwigshafen headed by Dr. WURSTER himself. 41 - 47
- 169 Affidavit of Oberstudiendirektor Dr. Hermann PINNOW of 6 December 1947. The witness is an historian, during Hitler's reign he was obliged to withdraw to the field of industrial history for political reasons. He was employed to write a history of the I.G. Farben plant Ludwigshafen-Opau and through this from 1940 to 1943 he became well acquainted with Dr. WURSTER. He states: "Dr. WURSTER was not only the driving force, but also the heart and soul of the progressive social policy pursued by the plants Ludwigshafen and Opau in continuation of an honorable tradition of many decades. His sole aim was: to make life easier for the tens of thousands in his charge and to bridge the gap between their often tedious day's work and their lives as human beings." 48-52
 The social care for the workers from foreign countries was handled in the same spirit. The witness has an extensive knowledge of the care of the workers from foreign countries as it had been his job to set up a final survey on this organizational work. Everywhere in the plant the witness found, "that everybody endeavored to improve the living conditions for the many thousands of workers from foreign countries..... and as far as the war conditions made it possible even to replace their home countries which were barred to them."

Doc. No.	Exh. No.	Contents	Page
----------	----------	----------	------

160		<p>Affidavit of Willi OEDENTHAL of 27 July 1947. As a Socialdemocrat the witness lost his position as director of an employment office in 1933 and is now President of the Regional Employment Office Pfulg. He reports on a letter written during the war by the chief of the Labor Front to the commanding general which criticizes that</p> <p>".....in the foreign labor camps of I.G. Farbenin Ludwigshafen such larger food rations were issued to the workers from foreign countries than to the German workers and that beyond that the sanitary and hygienic conditions as well as the accommodations as a whole far exceeded the living standard which would normally have been granted to a German worker".</p> <p>The German Labor Front told the witness that the workers from foreign countries were almost being spoiled in the I.G. Farben plant Ludwigshafen. During the war the witness had a report set up on the living conditions of workers from foreign countries in the I.G. Farben plant Ludwigshafen and the report turned out to be so favorable that he did not submit it to his superior office in order not to bring about measures to the disadvantage of the workers from foreign countries.</p>	53 - 56
248		<p>Affidavit of Anna WEIDLINGER of 19 January 1948. Since 1934, the witness has been employed as chief of plant welfare of the Ludwigshafen/Oppau plant. During the war she did welfare work for the female workers from foreign countries and she gives a description of the installations which were set up for these women.</p> <p>Dr. WURSTER's oldest daughter helped in the Kindergarten, established by the plant, which beside German children also cared for children of workers from foreign countries. Dr. WURSTER made a part of his own apartment available, when the regular quarters of the Kindergarten had been destroyed in an air-raid.</p>	57 - 59
173.		<p>Affidavit of Frau Dr. Marie Gertrud RECH-QUINCKE of 7 December 1947. In August 1944 the witness acted as interpreter for an inspection group visiting the foreign labor camp of the I.G. Farben plant Ludwigshafen/Oppau</p>	60 - 63

Doc. No.	Exh. No.	Contents	Page
-------------	-------------	----------	------

she states that during the free discussion with the visitors from abroad the workers did not voice any major complaints. The witness renders a detailed description of her impressions.

- 162 Affidavit of Jakob OTTINGER of 4 November 1947. During the war the witness was employed for four years as a German worker under compulsory service with a construction company in the area of the I.G. Farben plant Ludwigshafen-Oppeu. He reports on a case where in 1943 Dr. WURSTER personally intervened in a foreign labor camp. He states: "Among the workers of the Badische Anilin and Soda Fabrik in Ludwigshafen-Oppeu there was a general consensus of opinion that Dr. WURSTER endeavored to do everything he possibly could for the workers from foreign countries". The witness was in custody during the Nazi period and tried before a People's Court in 1937. 64 - 66

Accommodation of the workers from foreign countries.

- 239 Affidavit of Karl SCHMID of 28 January 1948. During the war the witness was Deputy Chief of the Storage and Supply Department of the I.G. Farben plant Ludwigshafen-Oppeu, which was in charge of supply for the workers from foreign countries. He describes the accommodation of the workers from foreign countries in communal camps, hostels, hotels and private quarters as well as the plant's endeavors to make the quarters of the workers from foreign countries as pleasant and comfortable as possible. 67-73
- 282 Affidavit of Franz ENTEL of 27 January 1948. As an engineer the witness was employed in the construction of several foreign labor camps in Ludwigshafen; he gives a detailed description of the construction and furnishing of the billets. "The construction and the furnishing of the housing camps was carried out without consideration of costs and work. The plant management wished to furnish the camp inmates with as comfortable living and sleeping rooms as possible and also with clean dining rooms, which could also be used for theatre and concert performances." 74-77
- 283 Affidavit of Fritz HARES of 27 January 1948. The witness was employed as a plant engineer in the construction of the Camps I and II in Ludwigshafen; he describes the plant management's endeavors to build healthy housing camps for the workers from foreign countries 78 - 81

Doc. No.	Exh. No.	Contents	Page
-------------	-------------	----------	------

which were sufficient in every respect.

14		A short account in tabular form of the number of beds and the number of persons living in the communal camps, of the I.G. Farben plant Ludwigshafen from 1 January 1942 to 31 December 1944. From the table it can be seen that a shortage of beds only occurred temporarily as a consequence of severe air-raids but that the shortage was always alleviated immediately. (The table will be submitted separately in limited numbers).	82
17		Affidavit of Fritz ZIEGLER of 16 March 1948 which affirms the correctness of the table Doc. WURSTER No. 14.	83
557		Proclamation in French of the Storage and Supply Department Ludwigshafen "to all French comrades of Camp II," dated 2 January 1942. The proclamation shows the endeavors to fulfill all requests concerned with food, accommodation, procurement of buying permits for shoes and textiles etc.	84 - 85
238		Food rations of the workers from foreign countries. Affidavit of Karl SCHMID of 25 October 1947 (see Doc. WURSTER 239). The witness gives a detailed description of the endeavors to feed the workers from foreign countries of the Ludwigshafen/Oppau plant, well, sufficiently and according to their national taste, and especially to procure additional food for them besides the food ration provided by the state. Two official food tables for plant and camp kitchens have been attached to the affidavit in order to illustrate this fact. These are: Enclosure 1, the table of September/October 1943 and Enclosure 2 the table of June/July 1944. Further the weekly camp menus, set up by the Storage and Supply Department have been attached to the affidavit in order to illustrate this fact, the menus show what food was actually issued; these are: Enclosure 3, standard camp rations for the time from 22 to 28 December 1940.	86 - 100

Doc. No.	Exh. No.	Contents	Page
238		Enclosure 4 standard camp rations for the time from 21 to 27 December 1941; Enclosure 5 standard camp rations for Frenchmen during the time from 30 August to 5 September 1947. Enclosure 6 standard camp rations during the time from 20 to 26 December 1942; Enclosure 7 standard camp rations for Italians from 20 to 26 December 1942; Enclosure 8 standard camp rations from 19 to 25 December 1943; Enclosure 9 food rations for the I.G. Farben hospital for workers from foreign countries from 24 to 30 December 1944. These enclosures show among others things that endeavors were made to issue especially good food on holidays.	
	4	Table of the food rations of different employment categories during the war and in 1947, based on calories, without consideration of additional rations for workers doing heavy and heaviest work.	101
301	310	Affidavit of Carl SCH ID of 22 March 1948 confirming the truth of the facts stated in Doc. WURSTER No. 4.	102
237		Affidavit of Albert A. HUELTER of 18 October 1947. Since January 1943 the witness was in charge of the kitchens and dining rooms of the communal billets of the I.G. Farben plant Ludwigshafen/Oppau; he gives a detailed description of the kitchen equipment and of the measures taken to provide good, sufficient and hygienic food for the foreigners. The witness states that the late chief of the Storage and Supply Department in fulfillment of directives of the plant management, frequently accompanied by the plant manager, Dr. WURSTER, inspected the camps and kitchens every day, tested the food here and there and did his utmost for the welfare of the foreigners; "absolutely nothing was good enough for him and he was busy day and night".	103-110
596		Excerpt from Prosecution Exh. 1335, Vol. 69, meeting of the Directorate in Ludwigshafen of 31 January 1941. The possibility of providing the I.G. Farben restaurants with frozen food is mentioned.	111
555		WIENS, Chief of the Storage and Supply Department Ludwigshafen, in a note of 4 February 1941 insists on a correct and exemplary attitude of the community leaders of the camp for Italians.	112-114
588		Excerpt from Pros. Exh. 1336, Vol. 69, meeting of the Directorate in Ludwigshafen on 21 August 1941. The fact is mentioned that 15 000 hot meals are served per day.	115

Doc. No.	Exh. No.	Contents	Page
518		Circular letter by WIEMS, Storage and Supply Department Ludwigshafen, to the camp leaders and to the camp kitchens, dated 20 October 1942. Reference is made to cases where a camp inmate complains about food to the camp leader. "A regular portion is to be immediately issued to the complainant..... It is not necessary that the fault of the one or the other is decided of the spot, but it must be seen to in the first place that the camp inmate, receives his due. The general decision can be reached later.	116 - 117
525		Bulletin printed in four languages, of the Storage and Supply Department Ludwigshafen of 25 November 1942: 118-119 "to our fellow workers in Camp I", the bulletin aims at ending the controversy about the varying daily bread rations.	
519		Circular letter of the Storage and Supply Department Ludwigshafen, to all kitchens dated 8 February 1944, concerning the correct and efficient distribution of sugar.	120
520		Circular letter of the Storage and Supply Department Ludwigshafen of 21 September 1944, concerning: the making available of coffee in case of shortage of a drinking water.	121
206		Affidavit of Susanna HABALE of 13 October 1947. The witness is of Czecho-Slovakian origin and since 1941 was employed in the kitchen of Camp I. She states: "The meals were always distributed in a decent, correct and efficient manner. Although I was almost always present personally, I never noticed any controversies between German and foreign "guest" workers. The kitchen employees comprised many different kinds of nationals and inspite of that were one family. The witness never heard of any complaints". The German superiors regularly conducted spot checks to inspect the meals."	122-123
204		Affidavit of Margarete JOSZED of 13 October 1947. In 1941 the witness came to Ludwigshafen from Czecho-Slovakia. She describes the decent treatment of the workers from foreign countries and that their food rations were c.k. During air raid alarms the German superiors were the last to leave the kitchen. "I can only state that I have always been treated decently. We were always helped in our troubles."	124 - 125

Doc. No.	Exh. No.	Contents	Page
-------------	-------------	----------	------

Clothing for the workers from foreign countries.

521		Letter of the I.G. Farben plant Ludwigshafen to the Economy Office Kaiserslautern, dated 14 October 1940 concerning work boots for workers from foreign countries. "The foreigners arrived here in strikingly poor foot gear. We ascertained that they had been unemployed for a long time and that they had apparently not been able to buy shoes in due time,.....all workers have been assigned to us by state authorities additionally, in order to enable us to fulfil our war production requirements." We therefore request you to grant us an <u>additional</u> quota of 1700 pairs of work and Oxford shoes.	126-127
523		Internal circular letter of the plant by Dr. WURSTER of 21 October 1940 asking to make available all available clothing items, underwear and shoes in order to alleviate . . . the most pressing needs of our foreign fellow workers' by this intra-plant self-help.	128 - 129
522		Report by WIENS, Storage and Supply Department of I.G. Farben Ludwigshafen to Dr. WURSTER, dated 7 December 1940, concerning: "Distribution of underwear, shoes, stockings and other clothing items, to our workers and employees from foreign countries." 130 - 135 WIENS writes: "Since August we have regularly obtained a considerable quantity of buying permits for our workers and employees from foreign countries; this was done to such an extent that the Economy Office feared that it would be to the disadvantage of the Germans if in future the foreigners were to be supplied at the same rate."	
565		Report by WIENS, Storage and Supply Department of I.G. Farben Ludwigshafen, of 3 January 1941; in the report a telegram of the Storage and Supply Department to the District Economy Office in Kaiserslautern is reproduced, which trenchantly demands the immediate assignment of shoes for the workers and employees from foreign countries.	136
589		Excerpt from Proc. Exh. 1335, Vol. 69, meeting of the Directorate in Ludwigshafen on 31 January 1941. The requests of clothing for the workers and employees from foreign countries can be fulfilled by an assignment of about 3 000 buying permits.	137
524		Circular letter No. 46 of 23 October 1942, signed by Dr. WURSTER, "concerning a plant collection of furniture within the plant for our	

Doc. No.	Exh. No.	Contents	Page
-------------	-------------	----------	------

communal camps and hostels: We ask for donations of items for the decoration of our German and foreign fellow workers' quarters; "furthermore we draw your attention to the fact that many workers from foreign countries came to Germany proper without being sufficiently provided with clothing, shoes and underwear". As in the last year, we ask you to contribute to the voluntary collection of shoes and clothing items for our fellow workers from foreign countries.

138 - 140

Foreign workers' pay from foreign countries.

124

Affidavit of Oskar HERMANN of 23 September 1947. During the war the witness was Chief of the Wages Accounting Office in Ludwigshafen. He states, that he had to report regularly to Dr. WURSTER on the financial circumstances of the workers from foreign countries and that Dr. WURSTER repeatedly gave him strict orders to give the workers from foreign countries the benefit of the doubt in dubious cases. The witness also describes Dr. WURSTER's endeavors to help the workers from foreign countries financially in case of damages sustained by air raids.

141 - 142

527

Circular letter of the Time Study Office of Ludwigshafen/Oppau of 31 May 1941 concerning permitting foreign works to do piece work. In case where foreigners do piece work they are at first to receive training allowance and later on a time allowance.

143 - 144

222

Affidavit of Georg HOFFMANN of 6 January 1948. Since 1935 the witness has been a time-study clerk in a mechanics workshop of the I.G. Farben plant Ludwigshafen/Oppau. "During the war I had to book a training allowance on the basis of at least 30 % for the initial four weeks for foreign mechanics doing this kind of work as directed by the Directorate, and another allowance of at least 20%, the following four weeks and at least 10% from then on.

145 - 146

221

Affidavit of Jakob JUELLY of 6 January 1948. The witness is a time-study clerk in the I.G. Farben plant Ludwigshafen and testifies to the same effect as the witness HOFFMANN.

147 - 148

Doc. No.	Exh. No.	Contents	Page
-------------	-------------	----------	------

291 Affidavit of Paul WEISS of 3 March 1948.
This witness also was a time study-clerk
testifies to the same effect as the witness
HOFFMANN.

149-151

526 Letter of the Oberbürgermeister of the city
of Mannheim to I.G. Farben Ludwigshafen, dated
27 November 1940, from which can be seen that
the I.G. Farben plant requested of him a reduc-
tion of the personal tax for the benefit of
the workers from foreign countries.

152 - 153.

COPY

The Manager of the Employment Office
Ludwigshafen on the Rhine.

To the I.G. Farbenindustrie A.G..

Ludwigshafen on the Rhine

Personnel Office 3 February 1941 5780/II G 5 February 1941

Subject: Allocation of Foreign Labor.

It has lately been observed by us that Dutch, as well as Belgian, Luxemburgian and Slovakian workers are applying for work in your factory.

According to a decree of the Reich Labor Minister such workers can only be employed after the regular documents have been submitted to the Reich Ministry of Labor. (Requisition - form Ve 5780).

I am herewith returning all the letters which you have forwarded to us during the last days with the request to let us have seven copies each of the required forms properly filled in. You are asked to send in these applications separated according to nationalities. Each of these applications will have to be accompanied by a list of names.

By order

signed: E R U G.

COPY

Document Book III WURSTER
Document No. 513

The Manager of the Employment Office
Ludwigshafen on the Rhine

Address: Ludwigshafen on the Rhine
Denkstrasse 8

Tel. 61611

Postal checking account 10 665
Ludwigshafen on the Rhine.

transfer a/c Reichsbank,
Ludwigshafen/Rhine

Branches: Frankenthal, Karolinenstr. 19, tel. 2184 - Gruenstadt Adolf-
Hitlerstr. 21, tel. 13, - Bad Duerkheim, Gendarmenstrasse 10,
Fernspr. 224 - Neustadt a.d. Weinstr., Landauer Strasse 61, Fernspr.
3118 - Speyer, Allerheiligenstr. 11, Fernspr. 3032.

Messrs. I.G. Farbenindustrie A.G.

Ludwigshafen on the Rhine

your file No. Your letter date our file No. date
5780-II/F Qu/Ko 15 December
1941

Subject: Allocation of Foreign Labor:
here: the French woman Angele MARCHANTEAU
born 9 July 1918, address 27, avenue de Paris,
Vincennes

The German recruiting office for workers in Paris informs us that
the above mentioned person wishes to be employed by you. If you
wish to employ this worker will you immediately make application
on form Va 5780 filled in in triplicate.

By order

signed, Signature.

COPY.

Ludwigshafen/Rhine, 20 April 1941

Contract between the Firm Dieu et Allain, Paris and
I.G. Farbenindustrie A.G., Ludwigshafen on the Rhine,
concerning assembly work to be carried out.

Concerning assembly work to be carried out by them (transfer of pipe-lines, assembly of apparatus and machines), Dieu et Allain (who in the following will be referred to as D.e.A. put at the disposal of the I.G. Farbenindustrie (who will hereafter referred to as I.G.) workers in the following branches:

- 1 technical engineer
- 24 head - assemblers
- 150 welders (gas - torch and electrical)
- 150 assemblers
- 175 assistant assemblers (175)
- 1 interpreter

The wages will be the following:

Technical engineer, Monthly salary RM 750.--, this includes overtime and Sunday-work, Separation allowance RM 4.40 per calendar-day.

Head-assembler RM 2.20 per hour

Welders, assemblers, assistant assemblers RM 1.80 per hour,

for these groups the separation allowance is RM 3.50 per calendar day.

For work done in excess of 48 hours weekly an overtime rate of 25% will be granted in addition to the regular wage. When work is required on Sundays or legal holidays an overtime rate of 50% in excess of the basic hourly rate will be payable.

The remuneration rate of RM 1.80 is ~~an~~ averaged wage scale, It applies to groups of the above given proportionate combination; but it can

(page 2 of original)

also be altered by agreement in case of essential divergence from the original combination.

The firm D. & A. will supply 30 - 40 welding machines and the other necessary tools for the assemblers. I.G. is prepared to buy these tools. Special agreements will have to be made with reference to these.

The above mentioned workers will be made available at the following dates:

up to 10 May 1941: 1 technical engineer, 5 head assemblers

70 welders, assemblers and assistant assemblers

1 interpreter

up to 25 May 1941: further 75 head assemblers, assemblers and assistant assemblers and welders

up to 15 June 1941: the remaining workers

Allocation will be made according to the directions of the I.G.

I.G. provides living quarters for the workers.

The price charged by the I.G. for quarters in camps (Barracks) or hostels will be R 0.80 per capita per day, breakfast included.

I.G. will charge for room and full board of the workers R 2.50 per person per day.

Transportation to and from the place of work will be chargeable to the I.G. In addition to this there will be a charge of R 9.60 per person per day for the workers.

Accounts will be settled directly between the I.G. and the D. & A.

Leave for the workers will be arranged by the D. & A. in agreement with the I.G. Compassionate leave paid for by the I.G. will be granted according to the applicable legal regulations.

(page 3 of original).

All legal disputes which might arise out of this agreement shall be subject to arbitration in the competent jurisdictional area, which in this case shall be Ludwigshafen/Rhine.

P.S. Interpreter's wage shall be RM 425.-- per month separation allowance shall be RM 3.50 per day.

At the express wish of the firm D.&A., we herewith state that the workers are, and will remain employees of the firm D.&A., pertaining in all rights and all duties arising out of such a position. The work will probably be terminated in three to six months. The firm D.&A. will be permitted to allow some of the workers to return home before their contract has expired and to replace them by other workers; charges will not be borne by the I.G.

Ludwigshafen on the Rhine, 20 April 1941

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT
Ludwigshafen on the Rhine

signed:

Dieu & Allain
Paris
signature

signed: KOHWINKEL signed ppa HOFFMANN

Excerpt from the minutes of the Directorate post-conference in
Ludwigshafen on the Rhine on 9 May 1941

It is a pleasure for us to be able to report that in April 360 apprentices
and young chemical workers will be engaged by us, thus forming a new
generation of employees. The shortage of skilled workers can
be relieved by the employment of 500 French mechanics (civilian wor-
kers), the first 180 of whom have arrived today and will be especially
looked after by a French technical engineer.

Certified correct copy
Nurnberg, 20 March 1948

signed: Dr. Wolfgang HEINTZLER
attorney - at - law

COPY

L.G.FABERINDUSTRIE AKTIENGESellschaft , LUDWIGSHAFEN ON THE RHINE

To the

Transportation office of the German Reichsbahn

Ludwigshafen/Rhine.

28 August 1941 M.

Journeys of French workers to France

On 27 August 1941, 15 French workers, employees of the firm Dieu & Allain, Paris, and at present working for us, wanted to go on leave to Paris. They intended taking the fast train which leaves Ludwigshafen at 19:23. As they were about to board the train commander refused them permission. At the request of the representatives of the firm Dieu & Allain to allow travel on the train, the train commander declared that nothing could be done about it; this was already the fourth time that he had accompanied the train and he had always refused to take French workers along. Questioned by the interpreter of the firm what was his reason for such action he is reported to have turned his back and not to have answered at all.

The French workers who were going on leave were in possession of a permit issued by employment office in Ludwigshafen as well as by the pass-(issuing) office VIII in Saarbruecken. They were also in possession of valid tickets which entitled them to the use of express trains.

As it is very important for us that the French employees of Dieu et Allain do not meet with unnecessary difficulties,

(page 2 of original)

we should like to ask you to inform us of the result of your investigations. As there are always French workers on their way from here to Paris we should greatly appreciate if if you would issue us with a intermediary report stating whether there are any regulations in existence according to which travelling with the afore-mentioned express train is not permitted to French workers. We attach special value to this information, because our approximately 900 French workers who are employed in urgent work are at present in a very natural state of excitement.

Heil Hitler!

I.G. FARBEINDUSTRIE AKTIENGESellschaft

signed: o.O. LING

ppa HOFFMANN

Handwritten notes

Distributed in camps and living-quarters.

I.G. FARBEN, LUDWIGSHAFEN

To the French workers employed in our factory.

Up to the present we have always granted leave to French workers for purpose of settling urgent family matters as far as that was feasible considering work-conditions, even in such cases where leave was not yet due according to German legal regulations at present in force. We now find that these workers going on special leave to France are either staying away for a period exceeding the time granted for leave or not returning at all. As such behaviour is not in keeping with the benefits granted by us out of our own free will, we shall in future not grant additional leave if such abuses continue.

We therefore request all French workers, going on leave male and female, to adhere strictly to the time of leave granted to them, as we shall otherwise in future grant leave only in accordance with legal regulations.

The Factory Management.

Lu, 22 March 1943

(Here follows the French translation of the same text)

(Translator's note)

COPY

To the

recruiting office for
labor in Germany

Field Post No. 29297

Page XIII/1 11 September 1941

24 September 1941/Ko.

Workers from the North of France

In answer to your inquiry of 11 September we herewith state that our reasons for dismissal of the French workers entered on our list are noted in this list in each case. We do not consider a forced return of defaulters to our local plant a useful move to make, as we know from experience that no satisfactory work can be turned out by our plant with such workers.

Heil Hitler!

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT

Personnel Department

signed ECKERT.

Copy.

AFFIDAVIT.

I, the undersigned, Otto ECKERT, born 27 December 1889 in Gernersheim, residing in Heidelberg, Kaiserstr. 41, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statements are true, and I have been informed that they will be submitted as evidence for the American Military Tribunal in the Palace of Justice, Nuernberg.

Since 1 July 1911 I have been employed in the plant at Ludwigshafen/Rhine of the I.G. Farbenindustrie Aktiengesellschaft. Since March 1919 I have been working in the Personnel Department, Employee Relations Division; since April 1938 I have been Chief of the Employee Relations Division.

On the basis of the records still available in my division and by virtue of my personal recollections, I can confirm that during the period from 1 April 1943 until 31 December 1944 the following turnover of personnel took place in the plant Ludwigshafen/Rhine-Opau of the I.G. Farbenindustrie Aktiengesellschaft:

	<u>New Employees</u>	<u>Departures</u>	<u>Balance</u>
April 1943	623	414	209 -
May 1943	166	1067	- 901
June 1943	218	484	- 266
July 1943	210	377	- 167
August 1943	206	499	- 293
September 1943	197	441	- 244
Uebertrag	1620	3282	* 209 - 1871

./.

(page 2 of original)

	<u>New Employees</u>	<u>Departures</u>	<u>Balance</u>
Transports:	1 620	3 282	* 209 - 1 871
October 1943	221	306	- 85
November 1943	69	415	- 346
December 1943	106	521	- 415
January 1944	332	258	74 -
February 1944	98	431	- 333
March 1944	146	296	- 150
April 1944	120	501	- 381
May 1944	284	206	78 -
June 1944	251	205	46 -
July 1944	186	158	28 -
August 1944	325	117	208 -
September 1944	245	248	- 3
October 1944	77	205	- 128
November 1944	117	204	- 87
December 1944	21	651	- 630
	<u>4 218</u>	<u>8 004</u>	* 643 - 4 429
		<u>* - 3 786</u>	

This table shows that in the period from 1 April 1943 until 31 December 1944 the number of foreign workers decreased continuously and that 8,004 foreign workers left our employment. If one compares the total of new employees during this period, there still results a net total of 3,786 foreign laborers who have left our employment.

In January and February 1945 a further reduction in the number of foreign workers took place, namely, 3,011. In the entire year of 1944 up until the time Ludwigsafen/Rhine

(page 3 of original)

was taken by the American troops on 21 March 1945, the plant Ludwigshafen/Rhine-Opau did not make it difficult with respect to the severance of their work contract for those foreign workers who wanted to leave.

It should be remarked that the table showing the influx of foreign workers is not complete since one must consider the fact that included among these foreign workers there is a certain number who left their employment as foreign workers in other firms in order to conclude a voluntary work contract with our plant.

Ludwigshafen/Rhine, 9 January 1948
(signed): Otto Eckert.

The above signature of Herr Otto Eckert was affixed before me, F.W. WAGNER, attorney-at-law, Ludwigshafen/Rhine, Schiesshausstr. 32, and is herewith certified and attested to.

Ludwigshafen/Rhine, 9 January 1948

(signed): F.W. Wagner
Attorney-at-law.

COPY.

AFFIDAVIT.

I, the undersigned, Otto E k e r t, born 27 December 1889 in Gernsheim, residing in Heidelberg, Kaiserstr. 41, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Koenigsberg, Germany, for Case VI.

1. Since 1 July 1911 I have been employed with the Badische Anilin- & Soda-Fabrik, Ludwigshafen/Rhine. From 1919 I was in charge of Employee Relations, and since 1939 I have been in charge of the Personnel Department for employees of the Badische Anilin- & Soda-Fabrik. By virtue of my activities during the war I am well informed as well with respect to labor allocation of the foreign workers.

2. During the entire period of the war the plant Ludwigshafen-Oppeu constantly strove, in filling its labor requirements which arose as a result of government production quotas, to hire, above all, German workers. This was in the interest of the plant simply in consideration of the difficulty entailed in making oneself understood with the foreign workers because of language differences; since because of these difficulties considerable more time was required in breaking in foreign workers than necessary in the case of German workers and, in addition, because of those difficulties there was the danger that accidents might occur owing to misunderstandings; attributable to this language difference.

(page 2 of original)

3. The efforts of the plant to employ, above all, German workers were, to be sure, not always successful, since in the war years an industrial enterprise actually had no influence whatsoever in filling manpower requirements.

Ludwigshafen/Rhine, 29 January 1948

(signed): Otto E c k e r t.

The following signature of Herr Otto E c k e r t, affixed before me, Dr. Wolfgang HEINTZELER, Ludwigshafen/Rhine, Bruckstrasse 13, is herewith certified and attested to.

Ludwigshafen/Rhine, 29 January 1948

(signed): Dr. Wolfgang H e i n t z e l e r.
Attorney-at-Law.

Copy.

AFFIDAVIT.

I, the undersigned, Eugen E i n s e n s s e n y, born 23 February 1891 in Ludwigsburg/Wuerttemberg, residing in Speyer/Rhine, Ludwigstr. 14, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statements are true, and I have been informed that they will be submitted as evidence for the American Military Tribunal in the Palace of Justice, Nuernberg, Germany, for Case VI.

From 1937 until 1945 I was Chief of the Employment Office for Vorderpfalz in Ludwigshafen/Rhine with the title Regierungsdirektor. At present I am Referent at the Regional Employment Office in Neustadt-on-the-Hardt.

In this capacity I dealt with the problem of labor procurement and labor allocation before, during, and after the war and therefore I am in a position to make certain statements and judgments with respect to the problems in this connection.

As to the question asked of me whether an entrepreneur had the possibility of rejecting the foreign labor assigned to him, so-called foreign workers, I can answer as follows:

During the war the entrepreneur was obliged to request his manpower on a printed requisition which was submitted to the competent employment office. As a rule, in this request for labor, the entrepreneur

(page 2 of original)

could not make any differentiation between German and foreign workers. If the request of the entrepreneur was recognized as urgent, such workers were assigned to him who happened to be available at that time. These might have been German women, German young people, redirected or retrained Germans, or those suitable only for limited service, or even foreign workers who might be available.

Any rejection by entrepreneurs of foreign workers during the war would have been regarded by the public authorities as sabotage against the production quota and thereby against the Reich and followed by appropriate measures.

Ludwigshafen/Rhine, 21 November 1947
(signed): Eugen Linzenmay.

The above signature of Herr Eugen Linzenmay was affixed before me, Friedrich Wilhelm Wagner, attorney-at-law, Ludwigshafen/Rhine, and is herewith certified and attested to.

Ludwigshafen/Rhine, 21 November 1947

(signed): F.W. Wagner
Attorney-at-Law.

Copy.

AFFIDAVIT.

I, the undersigned Dr. Alfred von N a g e l, born 13 August 1903, residing in Ludwigshafen/Rhine, Wolfrarstrasse 8, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nurnberg, Germany, for Case VI.

1.) On 1 January 1927 I entered the services of the I.G. Farbenindustrie Aktiengesellschaft, Ludwigshafen/Rhine, as a chemist. Since 3 September 1939 I have been an associate in the Planning Office T of the plant Ludwigshafen/Rhine.

2.) As a result of my work in the Planning Office, T, I am quite familiar with the organization of the wartime production schedule in the plant Ludwigshafen. Beginning already at the end of the year 1939 and on, entire production of the plant Ludwigshafen was in each case determined by order of the government directing offices. The directing office generally competent for us was the Reichsstelle Chemie (Reich Office Chemistry). The orders which controlled the production schedule of the plant were first called "Produktionsaufgaben" (production quotas); from 1943 on this was supplanted by the term "Herstellungsanweisungen" (production directives). These production quotas, or production directives, were issued in each case in written form. In all the pertinent decrees attention was continually drawn to the fact

(page 2 of original)

that negligent nonfulfillment of government orders would be subject to prosecution.

3.) The production of goods not ordered by a "production quota" or "production directive" would have been completely out of the question because of the strict supervision of our manufactures and inventory by the Reich Office. It would even have been impossible simply for the reason that the greater bulk of chemical raw materials were requisitioned by special orders of the Reich Office. These raw materials could be procured only with "priority approvals" and processed only with "use permits". Such approvals were, on general principles, issued only for such production which was covered by "production quotas" or "production directives".

Ludwigshafen/Rhine, 29 January 1948

(signed): Dr. Alfred von N a g e l.

The above signature of Herr Dr. Alfred von N a g e l, affixed before me, Dr. Wolfgang Heintzeler, Ludwigshafen/Rhine, Bruckstr. 13, is herewith certified and attested to.

Ludwigshafen/Rhine, 29 January 1948

(signed): Dr. Wolfgang Heintzeler
Attorney-at-Law.

COPY.

I.G. FARBEINDUSTRIE AKTIENGESELLSCHAFT

Personnel Department.

Ludwigshafen, am Rhine, 10 June 1942/In.

Confidential.

To:

Herr Dir. Dr. BAUMANN	Herr Dr. BUELOW, L.K. Dep't.
Herr Dir. Dr. EYMANN	Herr Dr. FISCHER, Intermediate Pro-
Herr Dir. Dr. KESSELER	ducts Dep't
Herr Dir. Dr. KRIEGER	Herr Dr. HELBERT, Trifarben Dep't.
Herr Dir. Dr. LAPPE	Herr Dr. PFITZNER, Azo Dep't.
Herr Dir. Dr. MUELLER-CUNRADI	Herr Prok. RUESS, Farben warehouse
Herr Dir. Dr. PFANNUELLER	Herr Dr. TELLER, Alizarine Dep't.
Herr Dir. Dr. PYLAUER	Herr Dr. ULRICH, T.N. Dep't.
Herr Dir. Dr. PIER	Herr Prok. WIENS, Economic Dep't.
Herr Dir. Dr. REPPE	
Herr Dir. SANTO	

Subject: Allocation of foreigners.

Experience gained from the allocation of foreigners up to now has shown that in part our employees are not sufficiently acquainted with the peculiarities of the various nationalities, and clumsy handling has led to departures which could have been avoided. In consideration of the almost decisive importance of a stable assignment of foreigners for our production, this source of error must - and the Reich Commissioner for Labor allocation recently referred to this with great emphasis - be removed under any circumstances. Consequently, we request you to instruct all German employees entrusted with supervisory duties in plants in which foreigners are employed, but this should take place in secret. As a basis for this, we have compiled a number of viewpoints which must be particularly observed in the case of employment of foreigners.

(page 2 of original)

Please attend to this matter and do not give the instructions one time only, but repeat them at certain intervals. We would furthermore be grateful to you for observations and suggestions from your sphere of work.

Personnel Department.

Enclosure

Copy.

Excerpt.

I.G. FARBEINDUSTRIE AKTIENGESELLSCHAFT

Personnel Department

Confidential

Ludwigshafen am Rhein, 8 June 1942/Im.

Viewpoints connected with the assignment of foreign workers.

The war is compelling us to employ foreign workers in our plants, in order to be able to do justice to the rising tasks of production. Experience gained up to now in the assignment of foreigners has shown that treatment in the plant and care in the communal camps are essential requirements for success. Therefore, it must not happen, considering the strained condition of labor allocation, that foreigners return to their native countries because they were not properly treated or cared for by us. Since the foreigners repeatedly complain to this effect with more or less justification, we would like in the following pages to compile the main points of view on the basis of the experience already gained:

In general it can be stated that the foreigner places particular value on just treatment. We know that in this connection he frequently takes a very one-sided standpoint. In each case, however, we want to give first consideration in the plant to just treatment and not, for example, treat a foreigner with less justice than our German workers, simply because we do not understand his language.

This includes judging the generally accepted fact of inferior production. We know that in various countries it is chiefly the inferior

(page 2 of original)

workers who apply for assignment to Germany. In a transport of that sort, naturally the ratio of slackers is substantially larger than the average in the country under consideration. However, we do not want to make the mistake of regarding the quality of the work of this nation as a whole as inferior on the basis of conditions of this sort. Many cases have come to our attention in which the German supervisor or worker has conveyed a concept of this sort to the foreigner by words or gestures. The inevitable result is that the foreigner, who is having difficulties anyway in adapting himself to conditions to which he is unaccustomed, feels such an attitude to be derogatory and has a negative attitude toward us from the beginning.

In connection with the assignment of foreigners, it is our most important duty to recognize persons who are obviously reluctant to work or the elements which undermine discipline and to return them to their homes as quickly as possible, since they not only endanger the assignment of foreigners, but the working morale of our own people as well. By no means should bad people be retained simply in order to have workers, because the work discipline of the employees as a whole is then regularly undermined.

The foreigner coming to us for the first time usually becomes aware of important differences from the habits of living in his own country. The industry of the German worker is unknown to him to this degree, and the manners are different.

(page 3 of original)

We must, therefore, take into account a few viewpoints in this field which among ourselves normally do not occur to us Germans. If we, therefore, want to work together with the foreigner, we must endeavor to understand his peculiarities and in particular adopt our conduct to them. If, for example, it is customary in a country to have especially polite manners by comparison to ours, we should observe this, but we must not fall into the error of exaggerated cordiality or undignified servility. In general it should further be said that the foreigner is very sensitive to swearing, especially in the cases when it is used because of a pardonable clumsiness or because of unfamiliarity with the circumstances.

If we fulfill the wishes of the foreigner in this manner, we must, however, see that the work discipline is maintained to the same extent. Poor production on the part of a foreigner, which can no longer be excused by his not having become adapted but can be traced solely to reluctance to work, must be answered with appropriate measures on our part. For this there are the following possibilities:

Cautioning by the supervisor, and if occasion arises, by the plant manager with written confirmation. Withholding of possible additional concessions for superior production.

(page 4 of original)

Fined, beginning with 1 - 2 hours, then increasing
to 4 hours up to one day's wages.

Copy.

The Deputy in charge of Construction
in the District
of Amarent Inspection III b

(18)
Homburg(Seer), 25 July 1944
Vocational College
Telephone: 591/92/94/95/96
P.O. Box 52

No. I 3

To the
I.G. Farbenindustrie
Stamp Herr Direktor S a n t o.

Ludwigshafen a. Rh.

Subjects Labor allocation

An assignment of approximately 1,000 Jews from the Eastern territories can be depended upon. According to report, there are men and women, in the approximate ratio of 2:1.

I would like to call special attention to the fact that the construction administration must provide for accommodation in concentration camps for the purpose of avoiding possible difficulties connected with turning over the camp.

Please inform us as to when the occupation of the camp and/or camps will be possible.

by order

(signed) Signature

AFFIDAVIT.

I, the undersigned, Baudirektor Gevill SANTO, born 30 March 1891, residing Ludwigshafen a. Rh., Hanserstr. 5a, have been duly warned that I make myself liable to punishment if I make a false affidavit. I declare under oath that my statement is true and was made in order to be submitted in evidence to the Military Tribunal in the Palace of Justice in Nuernberg, Germany, for Case VI.

1. From 1 May 1922 I have been in the service of the I.G. Farben plant Ludwigshafen/Rh.-Oppau as construction engineer. Since 1935, I have been head of the construction department of this plant.

2.) During the second world war, my duties included reporting the needs of the construction sector of the plant Ludwigshafen/Rh.-Oppau for additional manpower to the office of the competent "Deputy in charge of construction" of our area and to conduct the negotiations with regard to the assignment of additional construction workers.

3.) Within the scope of my activities as described in par. 2, I received a letter one day from the "Deputy in charge of construction in the District of the apparent inspection XII b" competent for our District, dated 25 July 1944 (Document WURSTER No. 570). In this letter the plant was informed of an assignment of approximately 1,000 Jews from the Eastern territories, in connection with which, special attention was called to the fact that the construction administration must provide concentration camp - like accommodation for these Jews.

4.) As soon as the letter described in par. 3 arrived, it was immediately clear to me that the assignment of these Jews to the Plant Ludwigshafen/Rh.-Oppau must be avoided if at all possible. On the other hand, I was conscious of the fact that an open rejection of these workers, in view of the very critical war situation at that time and in view of the very great shortage of manpower at that time, could under certain circumstances be interpreted as sabotage and correspondingly punished. After reporting to Herr Dir. Dr. WURSTER, who fully shared my opinion,

(page 2 of original)

I therefore informed the office of the Deputy in charge of construction that it would not be possible for the plant to provide concentration camp - like accommodations inside the plant and as a result of this we could not employ the Jews of whose coming we had been notified. On the basis of this information, after fairly long and difficult negotiations, the assignment of the 1,000 Jews announced in the letter dated 25 July 1944 was avoided. I would like to remark, however, that these negotiations were so difficult, that I doubt whether we could have maintained our negative position for any length of time if the development of the military situation in the West and the intensified air-raids on the plant had not disrupted the building activities in our plant anyway at this very time.

Ludwigshafen a. Rh., 16 March 1948

(signed): Camill S a n t o.

The above signature of Herr Baudirektor Camill S a n t o, performed before me, Dr. Wolfgang Heintzeler Ludwigshafen a. Rh., Brundstr. 13, is hereby certified and attested to by me.

Ludwigshafen a. Rh., 16 March 1948

(signed) Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Copy.

AFFIDAVIT.

I, the undersigned, Kurt H O F F M A N N, Diplomingenieur, born 17 September 1894 in Gera, residing in Ludwigshafen am Rhein, Erxbergerstrasse 52, have been duly warned that I make myself liable to punishment if I make a false affidavit. I declare that my statements are true and have been informed that they will be submitted in evidence to the American Military Tribunal in the Palace of Justice in Neurnberg for Case VI.

In 1922 I went to work for the former Badische Anilin- & Soda- Fabrik Ludwigshafen am Rhein, and was employed as a piecework engineer. In February 1940 I was commissioned to head the Personnel Department. My duties included reporting the requirements, for recruiting and distributing of manpower. In the middle of June 1944, an SS-Sturm-bannfuhrer came to me in my office from the concentration camp Natzweiler (Alsace). He explained that he had been informed that a large requirement of manpower had to be met in our plant. Therefore, steps had been taken to place at our disposal approximately 1,500 female Jewish concentration camp prisoners from Hungary for assignment to work. For their accommodation a camp belonging to the plant could be used, which was to be prepared according to special provisions.

(page 2 of original)

During the further course of the discussion, he expressed his astonishment that in our plant an SS-labor camp of that sort was not yet in existence, since it was, after all, the largest plant in the southwest German area and already in numerous other places - particularly in Wurttemberg and Baden - there were camps of that sort connected with industrial enterprises, which were supervised from concentration camp Natzweiler.

Although we had a very great shortage of manpower, I immediately decided that an assignment of concentration camp prisoners to our plant must be avoided if at all possible, since it would not be in accordance with the policy of the plant management and also would make a very unfavorable impression on the German and the other foreign workers and employees.

However, I did not dare to reject the offer immediately, because I did not know what office had authorized the step. I knew that enterprises had to employ all available reserves of any sort to meet the production requirements assigned to them, by virtue of a letter of HITLER of which we had been informed, so that there was the danger that an open refusal of these prisoners would be regarded as sabotage and penalized accordingly.

(page 3 of original)

Dr. WURSTER, whom I informed of the intended assignment, was immediately of my opinion that the allocation must be prevented for the above-mentioned reasons.

On the occasion of further visits of the representative of concentration camp Natzweiler, I raised technical objections each time and alleged industrial difficulties as an excuse in order to avoid employing the female foreign concentration camp prisoners in our plant.

Several weeks after the first visit, at the longest 2 months, Dr. WEISS, the head of our personnel department, told me on a Monday that on the preceding Saturday he was still in his office in the afternoon and was there requested by telephone from the Ludwigshafen railway station that the plant should pick up a transport of 500 female concentration camp prisoners which had just arrived. However, he refused to do this, giving as a reason the fact that it was not possible to accommodate them in our camp.

After that I heard nothing more from Natzweiler, and no other transport arrived or was reported.

The fact that in this particular case we succeeded in avoiding the assignment of concentration camp prisoners in an I.G. Farben plant without drawing down the charge of sabotage with all its serious consequences upon our heads I attribute mainly to the fact that at that time the success of the invasion in France was uppermost. Presumably in connection with our attitude, they completely desisted from

(page 4 of original)

assigning new concentration camp prisoners to industrial enterprises to the left of the Rhine, because this area soon thereafter became an area behind the front lines.

Ludwigshafen, am Rhein, 19 January 1948

(signed) Kurt HOFFMANN

The above signature of Herr Kurt HOFFMANN, Dipl. Ing., performed before me, Friedrich Wilhelm WAGNER, attorney-at-law, Ludwigshafen a. Rh., is hereby certified and attested to by me.

Ludwigshafen am Rhein, 19 January 1948

(signed) F.W. WAGNER

DOCUMENT BOOK WURSTER III
DOCUMENT No. 7

Page 34 of original

Illustrations from the Comunal Camps
of the I.G. Plant Ludwigshafen; issued end 1941.

(will be submitted separately in limited number)

C O P Y

Page 35 of original

A F F I D A V I T

We, the undersigned.

1. Valentin W a l t e r, born 1 March 1885, residing in Ludwigshafen/Rhine, Leuschnerstrasse 24,

2. Dr. Bernhard C y r i l x, born 30 July 1909, residing in Ludwigshafen/Rhine, Ernst-Lehmann-Strasse 21, having been duly warned that we make ourselves liable to punishment if we make a false affidavit, declare under oath that our statement is true and was made to be submitted as evidence before the Military Tribunal in the Palace of Justice, Saarburg, Germany, for Case VI.

1.) I, the undersigned, Valentin W a l t e r, have been in charge of the plant printing shop of the I.F. plant Ludwigshafen/Rhine since 1926. In this capacity I know that the plant management of the plant Ludwigshafen brought out a set of illustrations toward the end of 1941 for the foreign workers concerning the communal crops of the I.G. Farbenindustrie Aktiengesellschaft Ludwigshafen-Opau. Under my direction several thousand copies of this survey were printed in the following foreign languages in addition to the German language edition:

1 edition in French and Dutch,

1 edition in Italian and Spanish,

1 edition in Slovakian and Croatian.

Page 36 of original

This survey was distributed to all the foreign workers free of charge who were living in the communal camps.

- 2.) I, the undersigned, Valentin W a l t e r , further state that the document "Wurster No. 7" submitted to me represents an exact copy of the French-Dutch edition of the survey mentioned under paragraph one, with the qualification that in this copy the Dutch text has been replaced by an English text.
- 3.) I, the undersigned, Dr. Bernhard C y r i a x, employed as a chemist in the Badische Anilin-& Soda-Fabrik, Ludwigshafen/Rhine, since 1935, state that I am sufficiently familiar with the French as well as the English language; I confirm that the English text contained in the document "Wurster No. 7", "Illustrated Survey of the Communal Camps of the I.G. Farbenindustrie Aktiengesellschaft Ludwigshafen - Oppau," submitted to me represents a verbatim translation of the French text.

Ludwigshafen/Rhine, 11 March 1948

(Signed) : Dr. Bernhard Cyriax

(Signed): Valentin Walter

The above signatures of Messrs. Valentin Walter and Dr. Bernhard Cyriax, affixed before me, Dr. Wolfgang Heintzeler, Ludwigshafen /Rhine, Brunckstrasse 13, are herewith certified and attested to:

Ludwigshafen /Rhine, 11 March 1948

(Signed) : Dr. Wolfgang Heintzeler
Attorney-at-Law

DOCUMENT BOOK III - NURSTER
DOCUMENT No. 6

Page 37 of original

Copy

A F F I D . A . V I T

The undersigned,

- 1.) Obering. Kurt H o f f m a n n , Ludwigshafen /Rhine,
Erbergerstr. 52,
- 2.) Karl S c h m i d, businessman, Ludwigshafen/Rhine,
Frischenheimerstr. 40
- 3.) Albert H u e l t e r, businessman, Ludwigshafen/Rhine,
Ebertstrasse 32,

having been duly warned that we make ourselves liable to punishment if we make a false affidavit, declare under oath that our statement is true and was made to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nuernberg, Germany, for Case VI.

- 1.) The undersigned, Oberingenieur Kurt H o f f m a n n, was, during the Second World War, Chief of the Personnel Department of the I.G. plant Ludwigshafen -Oppau. The handling of all personnel matters concerning the foreign workers employed in the plant was incumbent upon the Personnel Department.
During the Second World War, the undersigned, Karl S c h m i d, was Deputy of the Director of the Storage and Supply Department of the I.G. plant Ludwigshafen -Oppau, who died in 1945. During the Second World War the Storage and Supply Department handled the accommodation feeding, and sundry care of the foreigners working in the plant; this applied in particular to the care of the communal camps constructed for the foreign and German workers.
From 1943 to 1945, the undersigned, Albert H u e l t e r, was employed in the Storage and Supply Department of the plant Ludwigshafen -Oppau. He was entrusted in particular with the supervision of the kitchens in the communal camps of the I.G. plant Ludwigshafen -Oppau.

Page 38 of original

2.) The collection of

"Pictures from the life of the foreign workers in the communal camps of the I.G. plant Ludwigshafen-Oppau during the Second World War,"

attached to this affidavit, comprising 101 photographs, was compiled by the undersigned from original photographs taken in the communal camps of the I.G. plant Ludwigshafen-Oppau, during the Second World War.

We expressly confirm,

- a) that all these pictures are authentic and retouched photographs from the life of the foreign workers in the communal camps of the I.G. plant Ludwigshafen-Oppau during the Second World War,
- b) that our written statements attached to this collection of pictures are true.

3.) We further state that the photographs contained in the afore-mentioned collection of pictures are typical of the conditions under which the foreign workers lived during the war in the communal camps of the plant Ludwigshafen-Oppau, with the exception of changes which occurred perforce during the latter part of the war as a result of the allied air raids.

4.) The undersigned, Albert H u e l t e r , states that he is fully familiar with the English and German language he confirms that the English text describing the above - mentioned collection of pictures represents a verbatim translation of the German text.

Ludwigshafen/Rhine, 2 March 1948

(Signed): Kurt Hoffmann

(Signed): Karl Schmid

(Signed): Albert . Huelter.

Page 39 of original

The above signatures of

- 1.) Kurt H o f f m a n n , Ludwigshafen/Rhine,
Ersbergstrasse 52,
- 2.) Karl S c h m i d , Ludwigshafen/Rhine,
Friesenholmerstrasse 40
- 3.) Albert H u e l t e r , Ludwigshafen/Rhine,
Ebertstrasse 32

affixed before Dr. Wolfgang H e i n t z e l e r ,
Ludwigshafen/Rhine, attorney-at-law. are herewith
certified and attested to.

Ludwigshafen/Rhine, 2 March 1948.

(Signed): Dr. Wolfgang Heintzelo
Attorney-at-Law

Page 40 of original

Collection of:

"Pictures from the Life of the Foreign
Workers in the Communal Camp of the I.G.
Plant Ludwigshafen-Oppau During the Second
World War."

(Will be submitted separately in limited number).

Case 6
Tribunal VI

Case No. 6

Supplement
to
Document Book III
for
Dr. Carl Wurster

(To be inserted after Document Wurster 6, Exhibit 9,
page 40.)

Gung

40aa

CopyA f f i d a v i t

I, Josef VOCK, photographer in the photographic plant of the Badische Anilin- and Soda-factory, living at Ludwigshafen on the Rhine, Bruno-Strasse 83, having been warned that I render myself liable to punishment by making a false affidavit, declare herewith on oath that my statement is true and was made to be submitted as evidence to the Military Tribunal at the Palace of Justice, Muenberg, Germany.

I herewith confirm that the pictures described in detail below and contained in the enclosure to Document Master No. 6 are true and were made by me during the war in the period from the end of 1941 to the end of 1943.

The photographs illustrate foreign workers employed by the IG Plant Ludwigshafen and their actual living conditions.

In enclosure to Document Master 6 these photos bear the following numbers:

1,	13,	28,	41,	54,	72,	85,	97,
2,	14,	29,	42,	55,	73,	86,	98,
3,	15,	30,	43,	56,	74,	87,	99,
4,	17,	31,	44,	60,	75,	88,	100,
5,	18,	32,	45,	64,	77,	89,	101,
6,	19,	33,	46,	65,	78,	90,	
7,	20,	34,	47,	66,	79,	91,	
8,	21,	35,	48,	67,	80,	92,	
9,	24,	36,	49,	68,	81,	93,	
10,	25,	37,	50,	69,	82,	94,	
11,	26,	39,	61,	70,	83,	95,	
12,	27,	40,	52,	71,	84,	96,	

Ludwigshafen on the Rhine
26 April 1948

signed Josef VOCK

48a

I certify and attest above signature affixed before me, Attorney
Dr. Wolfgang HINTZLER, Ludwigshafen on the Rhine, to
be that of Josef VOGL, Ludwigshafen on the Rhine, Brunckstrasse 88.

Ludwigshafen on the Rhine
26 April 1948

signed Friedrich Wilhelm WAGNER
Attorney

CERTIFICATE OF TRANSLATION

13 May 1948

I, M.E. Mason, hereby certify that I am a duly appointed translator
for the English and German languages and that the above is a
true and correct translation of the Document Number No. 330.

M.E. MASON
STU No. 6176

- 2 -
" END "

40B

Page 41 of original

COPY

A F F I D A V I T

I, Dr. Helmut S t u r m , Oberregierungsrat, residing in Heidelberg, Panoramastrasse 5. having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made to be submitted as evidence before the Military Tribunal in the Palace of Justice. Nuernberg, Germany.

From October 1937 until March 1945 was employed with the Labor Trustee in Saarbruecken as a consultant and collaborated in the computing of wage scales for the chemical industry. At present I am Referent in the Ministry for Labor, Wuerttemberg-Baden. in Stuttgart.

In this capacity I had frequent opportunity to become acquainted with the working provisions of those employed in the Ludwigshafen plant of the I.G.Farbenindustrie A.G., in particular with those of the foreign workers. In this connection I often had conferences with the Plant Manager of this plant, Dr. Wurster. The primary subject of these discussions was the routine social sphere of duties of the authorities whom I represented; however, during these discussions general political matters were also brought up. In consideration of the importance of the enterprise, I.G.Farbenindustrie A.G., I was naturally quite interested in becoming acquainted with the attitude of a person like Dr. Wurster toward social and political topics of the day.

Page 42 of original

Consequently, my observations were very precise and conscientious. I am convinced, therefore, that my appraisal of Dr. Wurster's person is a true one; also, as this concerns not purely factual statements but a personal, subjective opinion.

In contrast to the numerous plant managers of large, medium-sized and smaller plants, I was struck by the fact that Dr. Wurster's special interest lay in the field of social problems of the plant. I was always particularly impressed by this fact since, as far as I know, from Dr. Wurster's professional background, he is a Dipl. Ingenieur, and in the cases of other plant managers of large, but also of medium - sized and smaller plants, the commercial and technical plant problems are always of primary importance as a rule. It is very significant that Dr. Wurster personally concerned himself with the disposition of social matters and discussed matters with me in which, according to my experiences in other plants, I expected that the plant manager would be represented by a special consultant for such questions. I became convinced that all of Dr. Wurster's decisions pertinent to the employees of the plant were determined by a social-minded and humane attitude inherent in his nature. It transpired from this basic nature that Dr. Wurster evidenced no divergent attitude toward the foreign workers of the plant as well and, accordingly, treated them well. I gained the impression that his social attitude,

Page 43 of original

as Plant Manager, applied in large measure to the foreign workers with respect to their having been separated from family and homeland.

In order to appraise the person of Dr. Wurster and concomitantly to appraise his actions as Plant Manager, I feel it necessary to mention that I was never able to detect the qualities of toughness and ambition - qualities which seem to me decisive in many cases to rise to a position of Director and Plant Manager - in the case of Dr. Wurster. In comparing Dr. Wurster with other personalities holding very high positions in industry and with whom I came in contact, the last-mentioned observation induced me to re-consider this factor, and I came to the conclusion that in addition to outstanding technical ability, the human qualities and his social understanding were determinative for Dr. Wurster's becoming Plant Manager.

On the basis of the conversations which I had with Dr. Wurster concerning political matters I gained the positive impression - which, incidentally, can be seen perforce from the general humane and social attitude of Dr. Wurster, which I have sketched - that the political aims of National Socialism as well as the methods of domestic and foreign policy, and conduct of the war were contrary to Dr. Wurster's Weltanschauung, and that Dr. Wurster gave voice to his influence in the direction which his undefiled philosophy and conscience offered him.

Page 44 of original

I want to strengthen the general impression which I gained of Dr. Wurster through the following specific facts which I still recollect.

1. In 1943- I cannot recall the exact time - I took an automobile trip with Dr. Wurster from Ludwigshafen to Saarbrücken. Since at that time the topic of possible poison - gas warfare was on the lips of the population, I questioned Dr. Wurster about this matter. In this conversation Dr. Wurster expressed his revulsion to the idea of the use of poison gas, and told me that at that very time he, as well as other leading personalities of I.G., would strongly oppose any plans for the use of poison gas or - here I'm not quite sure of the facts - had already at the time of our conversation opposed such plans. On the occasion of this discussion Dr. Wurster condemned the political aims of National Socialism, in general terms the nature of which I cannot remember in detail.
2. Dr. Wurster invited me to an inspection of the Ludwigshafen plant. At the time of this inspection, which took up a whole day, Dr. Wurster acted as guide during the entire time. As I recall, in addition to myself, the Director of the Employment Office Ludwigshafen, Minzenmay and Oberingenieur Hofmann, who was in charge of social matters of the plant,

Page 45 of original

were also present; here and there the chiefs, as well as the representatives, of the employees of the divisions being inspected in the various parts of the plant, were also asked in each case to take part in these inspections. At first we inspected the billeting quarters of the foreigners. This inspection took up a considerable length of time, since Dr. Wurster attached great importance to showing us the social and excellent care in detail of all foreign groups. I still recall that the billets were clean and attractively furnished; they were even provided with central heating and running water. I was particularly impressed by the fact that the kitchen was not a uniform one but was equipped according to the customs of the various nationalities, just as accommodations were set up according to nationalities and closely associated group. The French had their own French kitchen, the Italians their own kitchen, etc., so that the peculiarities of the various foreign groups all received generous consideration. I was able to converse with any group of foreigners I pleased. Apart from the general feeling of homesickness, all of the foreigners whom I questioned expressed themselves as being quite satisfied with their accommodation and feeding in the camp. They also expressed themselves favorably with respect to their wages and treatment; only very insignificant complaints were mentioned, which were in no way as serious as those usually expressed by the German employees on the occasion of such inspections.

- 3.) I further know that Dr. Wurster also strongly advocated that family subsistence allowances usually paid to families in France be granted to those families of the Frenchmen who were employed in the I.G.Farbenindustrie in Ludwigshafen.

Page 46 of original

In France family subsistence allowances (women's and children's allowances) are paid out of so-called allowance - and allotment funds; the funds for this are provided by a levy imposed upon the plants which subscribe to these funds. As I recall, these levies amounted to about twelve percent of the total wages of the plants; which meant that the family allotments also amounted to about twelve percent of the wage of the breadwinner. As he told me at that time Dr. Wurster was carrying on negotiations in Berlin with the then Ministerialdirektor Dr. Mansfeld in the Reich Ministry of Labor with the aim of bringing about a payment of allotments in the amount above described to the families of the Frenchmen who were employed with the I.G. Farbenindustrie A.G.

There were also being carried on the requisite negotiations with the Price Czar at that time with respect to the alteration of the computation of costs conditioned by this plan, as explained to me by Dr. Wurster. Had the I.G. Farbenindustrie A.G. assumed the payments to the French allowance - and allotment funds, this would have meant an improvement in the situation of the French workers as against those of the German workers in the Ludwigshafen plant by about twelve percent - based on the wage scale, since the other wage components (base pay, piece work, bonuses) corresponded to the provisions applicable to German employees. Considerable misgivings in some degree existed with the authorities of the Labor Trustee as to Dr. Wurster's request since they had to anticipate the disadvantageous effects upon the morale and output of the German workers in the plant. That Dr. Wurster's efforts in this directions actually bore fruit, I was able to gather from a decree of the Price Czar which later came to my attention. As far as I recall, the Price Czar

Page 47 of original

rejected the paying by I.G. Farbenindustrie A.G.
of the amounts to the allowance - and allotment
funds and thereby frustrated Dr. Wurster's efforts.
The reason for this refusal may well have been
attributable to the wage and price policies.

Stuttgart, 31 January 1948.

(Signed) : Dr. Helmut Sturm

Above signature

herewith certified:

Stuttgart, 31 January 1948

Stamp of the

Ministry of Labor.

Stuttgart

(Signed): Kern

Reg.Ob.Latmann

COPY

Affidavit

I, Oberstudienrat Dr. Herman Finow, of Frankfurt am Main, Kaulbachstrasse 15, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice at Nurnberg, Germany.

Before 1933 I was known to wide circles through my historical publications on the Weimar Republic. One of my books, published in 1929, has appeared in two English editions under the title "History of Germany" (George Allen and Unwin Limited, 1934, and J.M. Dent and Sons, Limited, 1936, in Everyman's library) and also in one French and Italian translation respectively. During the Hitler regime I confined my activities to industrial history and was commissioned in 1939 to write a plant history of the I.G. Farbenindustrie, Ludwigshafen and Oppau Plants. Because of this I visited those camps almost daily for several months on end, on 1940 'til 1943 in greater intervals, and during this time I frequently had the opportunity to meet Herr Dr. Wurster and to become acquainted with him. Based on consultations with him and because of my personal knowledge of Dr. Wurster, I gathered the following facts and declare:

- 2 -

Not only was Dr. Wurster the responsible mainstay of the progressive social policy prevailing in the Ludwigshafen and Oppau plant during a long honorable tradition of several decades, but he was also the heart and soul of this policy. He knew but one objective: to alleviate all hardships of the tens of thousands of people under his care, and to close the gap between their frequently heavy daily chores and their standing as human beings. He did not consider them employees but solely human beings, and his favorite expression for them was "colleagues".

I may assume that it is well known in what way social welfare policy was administered in those I. G. plants. Here, I can only recall some individual facts of which I have gained knowledge at that time when sifting the plant records and files:

- 1) The system of granting family allowances, specialists and record output premiums, pay for public holidays, piece work and premium remunerations, had been developed in an exemplary manner, so that the actual pay of the workers exceeded the usual wage scale by more than 40 percent.
- 2) Even before 1938, weekly wages had been introduced for workers who had been in the plant for more than 25 years and who had acquired special skills.
- 3) Protection of the workers by building and equipping large messing facilities in an exemplary manner, which supplied first rate food.
- 4) Wholehearted promotion of housing projects, and of initiating the building of housing colonies (more than 1000 such colonies had been completed at the beginning of 1939, and more than 300 were in the planning stage at that time).

- 3 -

- 5) Exemplary recreational facilities inducing workers and employees to cooperate as much as possible.

The effect of such measures is evidenced by the fact that the workers were particularly loyal to their place of work. In 1939, eleven out of 100 workers were 50 years old and more, a record which has hardly been achieved in chemical industry. Furthermore, I want to mention the fact that almost half of all employees came from the workers' ranks; master craftsmen, senior computators, laboratory employees, and other employees almost exclusively rose from the workers' ranks. I know from my own personal experience that social welfare measures for foreign workers were handled in the same spirit as those for the Germans, as I concerned myself with the care for foreign workers, following a special commission of the plant management, and have written a comprehensive survey of this organizational work. I was familiar with the foreign workers' billets following numerous visits, and I know about the food from the menus and the weekly computations of caloric values, etc.; I myself saw the polyclinics, the hospitals, children's nurseries, and I also attended rehearsals for performances on several occasions, which were planned for the extremely active recreational programs.

Based on these impressions, I can state: Foreign workers were, in principle, treated in the same way as the German workers as far as a social welfare work was concerned. I always found camp managers, doctors, food supply supervisors, and recreational activities organizers extremely busy to do everything for alleviating the lot of the many thousands of foreign workers.

- 50 -

- 4 -

and to treat them as human beings and not as slave workers, even to the extent of replacing their homelands, which were inaccessible to them, because of war conditions. I recall that I often thought at that time: at some future date these camp inmates will speak favorably of Germany and of German customs. I cannot imagine that I should have been mistaken in this expectation.

In 1943 and at the beginning of 1944, I attended and participated in a social political measure, initiated by the Ludwigshafen Plant, which I thought singular for Germany at that time, and which was presumably the very first step in this direction. Conjointly with Dr. Wurster, the manager of the social welfare department, Dr. Weiss, following consultations with the plant psychologist Dr. Vetter and Dr. Seise, had started training courses for plant junior leaders on the Kohlhof near Heidelberg, which aimed at arousing and promoting their interest and understanding for matters concerning supervisors' duties in the plant.

During these courses I regularly gave a lecture concerning the history of the Ludwigshafen plant. During these lectures I fully recognized the importance of this measure for introducing a congenial and cooperative spirit in the relations amongst plant employees, but I was also able to ascertain that Dr. Wurster actively participated in promoting this course by visiting each student of the above course at the Kohlhof, giving lectures there, joining their suppers, and instigating detailed discussions amongst them.

(page 5 of original)

In conclusion I wish to state that I never witnessed such an active participation on the part of the plant managers, even down to the details of plant social welfare policies, as the activities of Dr. MURSTER at Ludwigshafen, although I dealt in my historical work with all the I.G. plants which became known through my publications.

Frankfurt am Main, 4 December 1947

Signed: Dr. Hermann PINNOW

I hereby certify and attest the above signature of Herr Oberstudiendirektor Hermann PINNOW of Frankfurt am Main, Kaulbachstr. 15, affixed before Professor Dr. Eduard W. H. L.

Heidelberg, 6 December 1947

Signed: Professor Dr. Eduard W. H. L.

Copy

AFFIDAVIT.

I, the undersigned, WILL ODETHAL, president of the Regional Employment Office, Pfalz in Neustadt an Der Saar, born 24 July 1896 at Cologne, residing at Gangelshausen near Mainz, have been duly warned that I render myself liable to punishment if I make a false affidavit and that I have been advised that his affidavit shall be introduced as evidence before the American Military Tribunal at the Palace of Justice in Nuernberg, Germany, in Case VI.

Until 1933, I was director of the Employment office in Bad-Kreuznach. When the Nazis seized power I lost my job, because I was a Social Democrat and opposed to National Socialism. On 16 February 1941, I was ordered on assignment as war administration inspector to the troop training center Ditsch in Lorraine. In this capacity it was demanded of me to assign Lorrainian workers to Ludwigshafen under the compulsory labor service act. I refused this. Then, I was transferred to Saarburg as a disciplinary measure. In November 1933 I was labor allocation superintendent for Military District XII in Wiesbaden. The whole of the occupied territory of Lorraine was under the jurisdiction of this military district. It was during this period that I established through some comrades that bad conditions prevailed in the foreign workers' camp of the branch army arsenal at Metz, and I took steps to eliminate these conditions. I applied to the senior commanding officer of Metz, and finally I managed that the working and feeding conditions for the camp inmates were improved.

(page 2 of original)

In 1944, I received an OKH order instructing me to recruit large numbers of Lorrainean workers from Lorraine and to allocate them in the armament industry of the Military District, and in the Ludwigshafen chemical industry.

I did not obey this order, and later on I was called to account for sabotage at the OKH in Berlin, Baudlerblock. As a matter of fact, since I did not obey this order, Lorrainean workers were not sent to Ludwigshafen.

The German Labor Front, Division Army, was responsible for the foreign workers in Military District XII.

The leader of the German Labor Front, who knew about my Metz measures, thereupon wrote to the Commanding General, expressing his amazement that I was active on behalf of the foreign workers to improve living conditions in their camp, as, on the other hand, it would be far more necessary for me to see and to investigate how it was possible that foreign workers in their camps at the I.G. Farben and the Giulini Plants in Ludwigshafen received a far greater amount of food than German workers, and that furthermore, sanitary and hygienic conditions as well as all billeting arrangements

(page 3 of original)

by far exceed the standards generally afforded German workers. He continued that he thought it timely to have an inspection by the Generalkommando as per the Fuehrer decree, which decree considered the people from the east as subhuman beings more than anything else. The German Labor Front approaching me made it clear to me that the foreign workers in the I.G. Farben Badische Anilin and Soda Factory were even spoiled and fussed about. In June or July of 1945 I made investigations concerning the condition of the foreign workers in the Badische Anilin & Soda Factory, Ludwigshafen-Oppeu, and I found that both food and billeting, as well as treatment, were generally good and much better than all other known arrangements. At that time I noticed especially that the I.G. Farben Plant in Ludwigshafen had a maternity ward.

On that occasion I requested an official of the garrison administration to submit a personal report concerning the condition of the foreign workers in the Badische Anilin & Soda Factory in Ludwigshafen. I still recall this report, although I have lost the document which was burned during an air raid. I know, however, that this report favorably mentioned all aspects of the foreign workers' problem. For example, the official had ascertained that expedient billeting within the plant area or in the immediate proximity of their places of work, made it possible for them to shorten their walk to and from work, that the food was tasty and was supplied in sufficient quantities, that furthermore, medical services and nursing facilities were afforded to the camp inmates,

Document Book III WURSTER
Document No. 160

(page 4 of original)

and that a maternity ward had been built which served its purposes in an excellent manner. Billets were clean and well equipped. Bedrooms and day rooms were separated, and made it possible for the camp inmates to feel as much at ease as the situation would allow.

Altogether, this report which had been submitted to me, induced me not to forward it to my superior office because I was rightly aware of the unpleasant repercussions which, strictly implementing the Fuehrer decree concerning accommodations and food in those foreign workers' camps, would bring about a turn for the worse. I took the German Labor Front letter and the report to my personnel files, and by omitting to register them, withheld them from ordinary business records.

Neustadt/Hdt. 27 October 1947

Signed: Willy OEDENTHAL

I hereby certify and attest the signature of Herr Willy OEDENTHAL as having been affixed before me.

Neustadt/Hdt. 27 October 1947

Signed: F. H. FLORNER
Lawyer

Copy

AFFIDAVIT.

I, the undersigned one REIDLINGER, born 8 February 1902, welfare worker at the Badische Anilin & Soda Factory, residing in Ludwigshafen on the Rhine, Schuckertstrasse 37, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before Military Tribunal VI at the Palace of Justice, at Nuernberg, Germany.

In 1923 I took up my duties as welfare worker for the Badische Anilin & Soda Factory, later with the I.G. Farbenindustrie A.G. Plant, Badische Anilin & Soda Factory at Ludwigshafen on the Rhine. In 1934 I was put in charge of plant welfare work. Up to the beginning of the war we had five welfare workers in the Ludwigshafen Plant and during the war, eight. It has been and still is our task to care for work employees and their families in cases of economic distress and to supervise health conditions, as well as caring for the children. When, during the war, foreign workers were assigned to the I.G. Farbenindustrie A.G. Plant, we also extended our welfare work to them. We did everything to assist the female foreign workers over and above the customary welfare work for women at their places of work by suggesting to them how to equip their homes, and by supplying the women with all their necessary personal items.

(page 2 of original)

We applied for and had granted permission to equip a sewing and mending room for the eastern female workers, while the other female foreign workers used the facilities that had been installed for German female workers. We also saw to it that an infants' home for the eastern workers was equipped, which proved to be necessary very soon, and we supplied clothing for the infants. Following our instigation, pregnant foreign workers were immediately taken out of the plant after their pregnancy became known, and were given light chores in the camp kitchen until several months after they gave birth to their children. This welfare work partly exceeded the efforts which were made for German workers who were pregnant. In the plant we had four kindergartens, one children's nursery, one playroom and one boys' and girls' nursery. These installations were built for the children of women employed in the plant, as well as for children of other employees. These installations, in particular the kindergartens, were principally open to the children of foreign workers, as well. Some of these female foreign workers made use of these facilities, and sent their children to the kindergartens. In the kindergartens all children were cared for and taught, irrespective of their nationality. They played together and there were no national borders. Incidentally, the two daughters of Dr. WURSTER inspected these kindergartens, and Dr. WURSTER'S eldest daughter later on even helped in the kindergarten. In our kindergartens

Document Book III WURSTER
Document No. 248

(page 3 of original)

we did not adhere to National Socialist principles, which fact attracted the attention of the Nazi authorities who reprimanded us. I know that Direktor Dr. WURSTER was highly interested in our welfare work and did everything to assist us in this work. He himself participated in Christmas celebrations that took place at the various kindergartens. When following air raid attacks on Ludwigshafen our regular home had been destroyed, Dr. WURSTER made arrangements that part of his own apartment was given up for these kindergartens.

Ludwigshafen on the Rhine, 19 January 1948

Signed: Anna BEILLINGER

I hereby certify and attest the above signature of Fraulein Anna BEILLINGER which has been affixed before me, Lawyer F.W. WAGNER, of Ludwigshafen on the Rhine, Schiesshausstr. 32.

Ludwigshafen on the Rhine, 19 January 1948

Signed: F.W. WAGNER
Lawyer

COPY.

AFFIDAVIT.

I, Dr. Phil. Maria Gertrud RECH-QUINKE, of Heidelberg, language teacher, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice at Nuernberg, Germany.

Concerning the treatment of foreign workers in the I.G. Plant Ludwigshafen, I am able to make the following statement:

In August 1944, several participants of a foreigners vacation training course stayed with me; the University of Heidelberg sponsored this course. Some of these people were Italians, such as an Italian lady doctor, Dottoressa Porini from Florence, and an Italian business man by the name of Ezio Lazzocchi from Siena.

I heard from Herr Dr. A. Weiss that on the occasion of a stay of Belgian professors and students, a conducted tour was planned through the social welfare installations of the I.G. plant Ludwigshafen, and I requested that the two Italians mentioned, and I myself as their interpreter, should be allowed to participate. This request was complied with. During this inspection we also saw a number of barracks camps housing civilian workers of various nationalities, above all, Eastern workers. The fact that the plant management of the Ludwigshafen Plant permitted foreign visitors

(page 2 of original)

to inspect these camps appears to be a clear sign that they thought these installations to be quite exemplary.

Our inspection confirmed this fact, which was also substantiated by the free and unfettered conversations which the Belgian guests were permitted to have with the French and Belgian workers, who, as far as I knew, did not lodge any major complaints. One minor complaint was, for instance, that the sausage which was served as cold cuts was not durable on account of the hot weather, which fact made it impossible to store it. The gentlemen of the social welfare department who conducted us through the camp made a note that this shortcoming was to be eliminated without delay.

I, being a woman, was particularly interested in the welfare work for the women and children in the Eastern worker's camp. The large camp hospital had, apart from an operation theater, a laboratory and numerous sick rooms, and a special maternity ward where Russian midwives were working. Infants were put in the infants' ward, which had the latest and most modernistic equipment. There was a kindergarten for the small children and a children's nursery for the bigger ones; for those attending school there was a school building where one German and one Russian teacher were working. As far as I can remember, there were approximately forty infants in the kindergarten and sixty children in the children's nursery. Approximately fifteen children attended school. Furthermore, I can well remember the congenial furnishings of the kindergarten, which suited the taste of the children admirably, and the kindness displayed both by the German and the Russian teacher. I was also impressed by the particularly pleasant furnishing of a number of barracks.

(page 2 of original)

which, as we had been told, housed the best and most efficient pupils. They were given material to clean their barracks, such as rough-surface paper, and also curtains, table covers, etc., etc. The children appeared to be gay and were obviously very contented.

Particularly impressive was the kitchen, which was spacious, meticulously clean, and equipped with the most modernistic machinery. There, I noticed large electric tipping frying pans, of a pattern which I had not known before. Pregnant women and those in child-bed were exempt from all work in the plant, and they had been detailed to light kitchen chores, such as peeling potatoes, etc.

The camps were remarkably clean and in good order, not withstanding the fact that several air raids had been made on the plant and the camps, already at that time. Herr W i e n s, the manager of the storage and supply department who conducted us informed us of the great difficulties in replacing bomb damaged equipment again and again, and he told us that he succeeded in getting new material as often as three times in several cases.

I remember that a bunker had been built in front of the hospital in the Russian camp, which served the purpose of accommodating sick people and children in case of air raids. In the so-called tradesmen's barracks of the Russian camp, a Russian woman was in charge of the tailor's shop. She knew some German and told us that she, who had been the owner of a large estate, had lost her husband, her sons and her estate through the Bolsheviks. She was very happy that she was allowed to work there, and she gave us a very favorable comment on the conditions prevailing in the camp.

(page 4 of original)

Heidelberg, 7 December 1947

Neuenheimer Landstrasse 8

Signed: Dr. Phil. Marie Gertrud

RECH-QUINCKE

I herewith certify and attest that the above signature of Frau
Dr. Phil. Marie Gertrud Rech -Quincke, residing at Heidelberg,
Neuenheimer Landstrasse 8, has been affixed before Professor
Eduard W a h l.

Heidelberg, 7 December 1947

signed: Professor Dr. Eduard W a h l.

COPY.

AFFIDAVIT.

I, the undersigned Jakob G t t i n g e r, born 17 December 1898 at Melkammer-Pfels, residing there at present Maxstr. 45, have been duly warned that I render myself liable to punishment if I make a false affidavit, that I have to state the truth, and that my affidavit shall be submitted as evidence before the American Military Tribunal at the Palace of Justice at Nurnberg.

In 1940 the employment exchange drafted me for work assigning me to the firm of Gerst, road construction firm in Melkammer, which firm, in turn, was a subcontractor for the plant of the I.G. Farbenindustrie Aktiengesellschaft, Badische Anilin- & Soda-Factory, Ludwigshafen/Rhine-Oppau. Because of this, I worked for approximately four years in the plant of the Badische Anilin- & Soda - Factory, Ludwigshafen on the Rhine - Oppau. I worked there as foreman supervising excavations during the road building project.

In 1943 several roads had to be constructed near the Rottstueckerweg at Camp No. 2, which housed foreign workers. I was working in this foreign workers' camp for approximately six to eight weeks. During this period, Herr Director Dr. WURSTER, together with several other gentlemen, repeatedly inspected the camp. During some of these inspections, I myself heard how Dr. WURSTER instructed the camp management that appropriate arrangements were required as far as housing and treatment was concerned, if these people (he was referring to foreign workers) could be expected to do any work at all. In this connection

(page 2 of original)

he complained about the billets, which he thought were not sufficiently clean. Following this complaint, an immediate and thorough camp cleaning took place.

I often observed during my work in Camp 2 and through working in the plant itself, where the foreign workers were employed, that Dr. WURSTER was very humane and considerate towards those foreign workers. In the Badische Anilin-& Soda- Factory, Ludwigshafen on the Rhine - Oppau the workers were generally of the opinion that Dr. WURSTER did not spare any efforts to help the foreign workers.

Both before and after the National Socialists seized power, I was their determined opponent. For a period of 18 month I was held in custody at the district court prison in Ludwigshafen because of my hostile attitude and activities against the Nazis during the Hitler regime, and in 1937 I was on trial of high treason before the People's Court at Berlin. Besides, I had been declared unworthy to carry arms because of my anti-Nazi attitude. In 1942 I assisted two French POWs to escape by providing them with civilian clothes and food supplies. Furthermore, in September 1944, I protected two American pilots, who had bailed out and were injured, from the furious crowd and thus saved their lives. Because of my political views I was entirely sympathetic towards the foreign workers, but although I liked these foreign workers I am forced, in the interest of the truth to put down on paper the facts as mentioned above.

(page 3 of original)

If something did happen which was directed against the foreign workers in the Badische Anilin- & Soda- Factory, Ludwigshafen on the Rhine & Oppau, and which was not quite in order events of which I had no knowledge and of which I had never been informed, I would have to state that this happened in opposition to Dr. WURSTER's wishes.

Maikammer, 4 November 1947

signed: OTTINGER, Jakob.

I herewith certify and attest the above signature of Herr Jakob Ottinger which has been affixed before me, lawyer Frederick Wilhelm Wagner, residing at Ludwigshafen on the Rhine.

Maikammer, 4 November 1947

signed: F.W. WAGNER.
Lawyer.

Copy.

AFFIDAVIT.

I, the undersigned Karl Schmid, born 6 January 1884 at Memmingen, residing at Ludwigshafen on the Rhine, Friesenheimerstr. 40, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is full truth and that it has been made in order to be submitted as evidence at the Palace of Justice in Nuernberg, Germany, for use in Case VI.

1.) Since 27 November 1917 I have been working for the I.G. Plant Ludwigshafen on the Rhine. During the war I was the Deputy for the manager of the storage and supply Department, who died in 1945. The Economy Department during the war was in charge of caring for the numerous foreign workers in the Ludwigshafen Plant.

2.) Foreign workers were directed to the I.G. Ludwigshafen Plant during the war in accordance with the same principles that applied to German workers. If any foreigners were unable to obtain private billets in the town, the plant supplied communal camps, hostels, (Kameradschaftsheime) as well as hotels, in which they were then billeted.

I. Communal Camps.

3.) In spring 1940, the I.G. assigned its construction department to build the first camp. Following instructions

(page 2 of original)

by plant manager Dr. WURSTER, this camp was to be equipped with all installations and furnishings which were necessary to make it a comfortable home for the plant employees, affording them the necessary recreation in their leisure time. Bearing this in mind, an entire camp for 400 men was then first acquired which was ready for moving in, and whose equipment was superb even for the most spoiled people.

In the course of the war the authorities introduced special allocation schemes for the distribution of all building materials as well as furnishings. Nevertheless, the plant management constantly endeavored to buy the necessary material for equipping and building the billets whenever possible.

4.) Altogether seven large communal camps were built, the design of which can be seen from the blueprint document WURSTER I, exhibit WURSTER I. These camps were built at not too great a distance from the plant in order to obviate tedious routes from and to work for the camp inmates.

5.) Wide roads reinforced with asphalt and partly covered with concrete surfaces ran through the communal camps. Extensive lawns and gardens made the camp a cheerful sight.

The camp buildings were mostly built from wood and stood on concrete foundations. Dispersed amongst them were also brick buildings. Camp VII consisted entirely of brick buildings.

6.) Four to twelve beds (2 tiers) were in the living rooms including the necessary cupboards, chairs, and tables. The majority of the billets consisted of 10 rooms with 12 beds each.

(page 3 of original)

Each bed was equipped with a straw mattress, a pillow and two blankets. All beds had bed clothes. When, towards the end of the war, bed linen was not easily obtainable, arrangements were made that at least the female foreign workers received their bed linen. The camp of the western workers, too, received bed linens.

7.) Bathrooms were separate from the living rooms and were mostly located in special buildings. Their modernistic equipment with running hot and cold water in all the camps was quite up to the latest hygienic requirements. Showers, bathtubs, and foot bathtubs afforded them the possibility of thorough cleaning. The lavatories, which were located in special buildings, were, throughout the camp, WCs and had individual cabins.

8.) Food was distributed in mess halls which were comfortably equipped with all the furniture available, and which afforded sufficient seating facilities for evening performances. A stage in all the camps made it possible for the workers to have performances.

9.) Each of the camps had installations which were built in order to save the inmates all time-consuming errands outside the camp, such as barber shops, tradesmen's shops, laundries, and dry cleaning rooms, as well as canteens, storing all the commodities of every day life which were available at that time.

The Storage and Supply Department constantly was endeavoring to supply adequate clothing and footwear for the foreign workers, which became increasingly difficult on account of the prevailing conditions.

(page 4 of original)

However, they succeeded in obtaining an unusually large amount for the camp inmates considering the conditions at that time. Specially equipped clothes rooms had been built, where clothes were stored and issued after applications had been examined.

10.) Dispensaries, sick bays, dental clinics, as well as a maternity ward and infant's nursery in the camp for eastern workers were available for maintaining health standards and for affording medical treatment. The factory's sick fund had a branch in Camp I for the Camp inmates.

Vermin extermination installations made it possible that all newcomers were free of vermin. Also, in regular intervals, their billets were disinfected. All living and day rooms were heated during the cold season, and fuel was freely distributed. The camp for the eastern workers, as well as Camps II and III, which housed mostly French workers, had central steam heating which was supplied from the camp, because these two camps were quite close to the plant itself.

11.) Large scale building projects for erecting such a communal camp, for instance, leveling of the territory, building of roads, camp inclosures, canalization projects, water and electricity supplies, setting up of buildings (housing barracks), kitchen and mess rooms, storage buildings, bathrooms and lavatories, administration buildings, etc.) caused considerable expenditure. However, following Dr. WURSTER's instructions all expenditures were granted

(page 5 of original)

to make the camp billets as pleasant and accomodating to the foreign workers as possible.

II. Hostels (Kameradschaftsheime)

12.) As hostels, of which there was a considerable amount even before the camps were built, storage and business rooms, halls, as well as some school buildings, which had been converted into billets, were used. During the war they were not used for their proper purpose, and they were equipped in the same way as I have described concerning the camps. Altogether, there were approximately forty hostels which were dispersed over all sections of the cities of Ludwigshafen and Mannheim.

13.) Assigned workers in the hostels received hot meals in the plant kitchens or in the recreation building. Some of them had their own kitchens which were just as well equipped as the plant kitchens.

III. Hotels and Private Billets.

14.) The hotels which had been rented by the plant management accomodated mostly foreign workers. Accomodations were such as could be expected in a better class hotel.

The guests could have their breakfast in a breakfast room, while they had their main meals, together with the German employees, in one of the large plant mess rooms - either in the communal building or the recreation building.

15.) More than, 1,000 foreign employees were billeted in private rooms of the city area during the war. I know that the police issued

(page 6 of original)

very stringent decrees according to which foreigners in private billets were to be housed in the plant camps. However, the plant management opposed this plan, because these foreigners were exclusively quiet and reliable employees. The camp management supported this by stating that no accommodations were available.

IV. Administration.

16.) A considerable administrative machinery was required to deal with all matters concerning accommodation and billeting as smoothly as possible.

The manager of the storage and supply Department had a central administration office for this purpose, in which all general matters were dealt with (acquisition of furnishings and clothing, billeting planning, examination of requests, both ordinary and urgent.). This office issued instructions to the leading administrative officials who were in charge of the various administrative branches in the individual camps. By using interpreters they dealt with personnel and supply problems for the camp inmates, who were housed in their jurisdictional sections, they issued rail tickets, were in charge of post offices, and had to deal with all other tasks that cropped up during an ordinary working day as submitted by such a large number of people.

It was sufficient in the hostels with their simple operational schedule that a hostel janitor took care of all matters there. These elderly quiet men, who did every thing to care for their guests,

(page 7 of original)

did everything to make their stay in such a hostel a pleasant recreation from their work.

17.) There were, of course, considerable difficulties because of the simultaneous accommodation of many thousand employees of various nationalities together with numerous Germans.

If there was a very large number of employees of one and the same nationality, it was possible to billet them in one camp (for instance, a communal camp for eastern workers, and another one for French workers).

In camps with only small numbers of inmates, the camps had to be divided amongst the various nationalities, and it was quite customary that foreign workers of various nationalities were billeted in the same communal camp with the German inmates. The individual groups of workers of the same nationality were usually billeted in one hostel. In this manner the foreign workers' comradeship and mutual national bonds could be retained. Female workers were, in principle, billeted separate from the male workers. Generally, they were billeted in hostels according to numbers and nationality.

Ludwigshafen on the Rhine, 28 January 1948

Signed: Karl SCHMID

I herewith certify and attest the above signature of Herr Karl Schmid, affixed before me, Dr. Wolfgang HEINTZLER of Ludwigshafen on the Rhine, Bruckstr. 13.

Ludwigshafen on the Rhine, 28 January 1948.

Signed: Dr. Wolfgang Heintzler.
Lawyer;

PAGE 74 of original

GOPY

A F F I D A V I T

I, Franz M e n t e l , born 29 August 1895 in Ludwigshafen on the Rhine, of the address of Ludwigshafen Rhine, Bremerstrasse 102, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal, Case VI, Palace of Justice, Nürnberg, Germany.

1. In 1921 I entered the services of the Badische Anilin- & Soda-Fabrik, Ludwigshafen/Rhine and am still employed by this firm as a Bauingenieur (Construction-engineer) .
2. During the war 3 camps for foreign and German laborers were constructed under my supervision which were designated as camps I, II and VI.
2. Camp I was originally constructed for approximately 2000 persons in the year 1941/42 between borders of the plants Lu and Op (Wottstuecker eg). It consisted of 23 buildings serving as living quarters, 2 mess-buildings with built in kitchens, 2 bathhouses with barber's shops, 9 lavatory-huts, 1 administration building, 1 dispensary and 1 delousing hut.
3. The individual building serving as living-quarters were built of timber, with rock-wool insulation covered between two walls, the flat roofs were ^{covered} with a double layer of tar-paper and were in some cases built on pile-work or concrete foundations. The outer and inner coats of paint were fire-proofed.

Page 75 of original

Each of these living quarters contained 10 rooms for 12 men each and 4 rooms for 2 men each. There was 8.30 cbm living space provided for every man. Each of the large rooms had 6 twin beds with straw mattresses, head-rest, blanket and bed-clothes, as well as 6 double-cupboards, stools, chairs and table electric lighting as well as fire extinguishers in the passages.

4. The mess buildings with diningroom and kitchen were also built of timber, there was a cellar under the kitchen for purposes of storing provisions, electrically heated kitchen-equipment, i.e. a cauldron, frying pans, electric appliances etc.
5. The washrooms were situated in the right hand part of the building, there were dressing rooms as well as shower-baths, while on the lefthand side the wash-stands or "Waschpille" were equipped with hot and cold running water. Each bathhouse contained also 2 bathtubs, a wash house and a barber's shop.
6. The buildings containing the lavatories were centrally located in the vicinity of the living-quarters, had continually flushed urinals, whereas the lavatories had individual closets which could be locked and which automatically flushed.
7. Waste water from lavatories, dispensary bathhouses and kitchens passed through filters to the side sewer or the main drainage system.
7. The chief camp leader and his fellow camp leaders (Kameradschaftsfuehrer) were housed in small rooms in the administration building; there were also post offices, for receipt and payment of money, and other administrative offices.

Page 76 of original

8. The dispensary - or sick - bay barracks consisted of sick rooms, waiting-room, consultation room, sitting rooms for doctors and hospital attendants, bathrooms and lavatories.
9. The streets were graded and tarred, there were lawns between roads and buildings. The streets were electrically lighted .
10. All buildings were equipped with central heating and two boiler-houses which supplied at the same time the bathhouses, mess barracks, dispensary- and delousing barracks with hot water.
11. Camp II had room for 1 800 men and was built in the year 1942. It was built and equipped in the same way as camp I .
Camp VI was built for 2 500 men and was built in 1943-1944. Constructed in the same way as the other camps the streets, however, were made of concrete; bathhouse as well as dispensary barracks were equipped with hot and cold running water and equipped with central heating. All other huts had either brick or iron stoves which were heated with coal.
12. No cost or effort was spared in the building and equipping of the living quarters; it was the desire of the factory management to provide the camp-inmates with the best- possible living - and sleeping quarters as well as clean dining rooms which could also be used for theater performances and concerts.

Page 77 of original

Ludwigshafen, a Rh. 27 January 1948

signed: Franz Mentel

The Above signature by Herr Franz M e n t e l affixed
before me, Dr. Wolfgang Heintzeler, Ludwigshafen
on the Rhine, Brunckstrasse 13, is herewith certified
and witnesses by me.

Ludwigshafen on the Rhine, 27 January 1948.

signed: Dr. Wolfgang Heintzeler
Attorney-at-Law.

Page 78 of original

COPY

A F F I D A V I T

I, the undersigned Fritz Marks, born 21 June 1897, in Karlsruhe i.B. of the address of Ludwigshafen on the Rhine, Luerstzasse 4, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare that my statement is true and was made to serve as evidence in case VI before the Military Tribunal, Palace of Justice, Nuernberg, Germany.

1.) As the responsible plant engineer for underground engineering of the I.G.Farben plant in Ludwigshafen, with which I have been since 1928, I was, from 1940-1944 in charge of street - and road construction, canalization and drainage of buildings as well as all underground engineering necessary for the supply of Camps I, and II with power, such as gas, water and electricity. I was, therefore, able to get a clear picture of the construction of Camps I and II which were being built for foreign and German laborers.

2.) The camps were spaciouly laid out. Camp I covered an area of 7,5 ha. 1,6 ha of these were taken up by living quarters and other buildings (dispensary, kitchen, heating -plant, baths, lavatories etc) so that something like 80% of the total area was open space. There was, therefore, ample room for all installations, those above ground as well as those underground. The fresh water pipes which held the water-supply for fire- extinguishing purposes flushing of the lavatories

Page 79 of original

etc, were connected with the pipe lines of the factory, whereas the drinking -water pipes were connected with the town-water-supply-line. Steam was produced in a special boilerplant and the pipes were conducted to the buildings in special concrete tunnels. In this way one managed to avoid overhead pipes (Rohrbruecken) which would have spoiled the whole aspect of the camps.

3.) The network of Streets and roads were planned in the same careful way. The main roads which covered altogether 11 ha. were constructed according to the most modern principles, and at great expense. A solid foundation of rock gravel was covered with asphalt, bordered by curbstones so that the lawns were pleasantly set off against the streets. The footpaths and entries to the separate buildings were covered with yellowish brimstone from the Odenwald and provided an agreeable contrast of color to the green of the lawns, and ornamental shrubs. It was in such a way possible to avoid even in damp weather having unnecessary dirt carried into the living - quarters an arrangement which greatly contributed to the cleanliness and homeliness of the living quarters.

4.) Particular attention was given to the hygienic demands by construction of a widespread system of canalization (Approx. 1 km) which was in every way equal to the demands made upon such municipal installations. Lavatories were installed in 9 separate buildings and were provided with water-flushing

Page 83 of original

and heating; furthermore there was a fresh - water filter installation ^{inserted} ~~erected~~ between each of these lavatory - buildings and the sewers, so as to avoid nuisance from evil odors.

An automatic pumping station connected the sewer network with the main canalization - system of the plant.

5.) Camp II was constructed on the same principles of careful planning and technical thoroughness as Camp I; here too one kept to the same principle of spaciousness which was typical for all the Camps of the Plant and is a sign of the desire to create healthy living conditions.

6.) The above report restricts itself to the description of the general construction of Camps I and II. And just as the internal construction of the living quarters and the administration buildings (bathhouses, kitchens, day-rooms, hospitals etc) reflect the desire of the plant -management to provide for the foreign laborers sanitary and in every way unobjectionable living quarters, the general construction bears proof that the humane treatment of the foreign workers was the main aim of these leading personalities and that no pains or cost were spared in the realization of these ideas.

Ludwigshafen, on the Rhine. 27 January 1948.

signed: Fritz M a r k s

Page 81 of original

The above signature of Herr Fritz M a r k s ,
affixed before me, Dr. Wolfgang Heintzeler,
Ludwigshafen/Rhine, Brunckstrasse 13, is herewith
certified by me.

Ludwigshafen on the Rhine
27 January 1948
signed: Dr. Wolfgang Heintzeler
Attorney-at-Law

Page 82 of original

Table of number of beds provided and number of inmates of the communal camp of the I.G.Farben plant in Ludwigshafen during the time from 1 January 1942 to 31 December 1944. The table shows that shortage of beds was only temporary and caused by severe air-raids and was always rectified as quickly as possible.

(A limited number of copies of the table has been submitted separately).

Page 83 of original

Copy

A f f i d a v i t

I, Fritz Ziegler, residing in Ludwigshafen on the Rhine-Oggersheim, Friesenheimerstrasse 219, having been duly warned that I make myself liable to punishment if I make a false affidavit declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nuernberg.

I confirm that the Wurster Document No. 14, which was made up in order to be submitted before the Military Tribunal in Nuernberg, and which represents a statistical report of the personnel quarters of the I.G. Farbenindustrie Aktiengesellschaft, Ludwigshafen on the Rhine - showing the number of beds and personnel in the period from 1 January 1942 to 31 December 1944, air-raid damages as well as measures for their rectification was compiled by me on the basis of available relevant documents and that it is true.

Ludwigshafen on the Rhine, 16 March 1948.

(signed) Fritz Ziegler.

The above signature of Fritz Ziegler, residing in Ludwigshafen on the Rhine - Oggersheim, Friesenheimerstrasse 219, affixed before Dr. Wolfgang Heintzeler Attorney-at-Law, Ludwigshafen on the Rhine, is hereby certified and witnessed by me.

Ludwigshafen on the Rhine, 16 March 1948.

(signed) Dr. Wolfgang Heintzeler
Attorney-at-Law.

Page 84 of original

COPY

I.G.Ludwigshafen
Storage and Supply Department

Ludwigshafen, 2 January 1942

To all French fellow workers in Camp II

In all our camps we have the institution of the workers' spokesmen who act as intermediaries between the camp-leaders and the workers. In agreement with the Firm of Dieu & Allain we have now appointed workers' spokesman also for this camp. It will be their task to create closer relationship between the camp-leaders, your own firm and ourselves.

In future the workers' spokesman will be responsible for order and tidiness in the camp.

The requisite condition is that you yourselves work towards this end and thus facilitate his job.

The workers' spokesman will be at your service during his working hours and will deal with all your wishes concerning food, quarters shoe coupons and clothing coupons. Your application for such coupons ought to be made to the office of the group-leader who will also turn over to you the coupons provided by the Storage and Supply Department or by the Economy office of the city.

From next period onward you will also get your soap coupons from your workers' representative. The weekly ration cards will be distributed by the office of the firm of Dieu and Allain as before.

It is inadmissible for you to exchange rooms and beds without informing your workers' spokesman, and without his authorization. He has been charged by the camp-leader with their distribution.

Page 85 of original

Previous to going on leave or returning home to France for good, you ought to inform your workers' spokesman who will sign the form which you will receive, and who will issue you with the necessary papers. No passports will be issued to you by the office of the firm Dieu and Allain if these forms do not bear the signature of your workers' spokesman. On returning from your furlough you ought to see your workers' spokesman first of all.

You must consider your workers' spokesman as your comrade who should serve you as an example in camp-life, and who is there to help you and to represent your just interests. He will be your adviser who will ^{help} you in surmounting all the difficulties which may arise in camp-life.

His orders, given in the name of the camp leader, must always be strictly observed and followed.

We hope that we are helping towards creating favorable conditions for collaboration, order and peace in the camp by this institution, and that we are in this way guaranteeing your utmost wellbeing.

Let those workers' spokesman have your full confidence, which they must have in order to enable them to do their job properly, which has as its aim the welfare of the community.

Storage and Supply Department (WIRTSCHAFTLICHE ABTEILUNG)

Copy

I, Karl SCHMID, Ludwigshafen am Rhein, Friesenheimerstrasse 40, born 6 January 1884 at Messingen, have been duly warned that I make myself liable to punishment if I make a false affidavit. I declare under oath that my statement is true and was made in order to be submitted in evidence to the Military Tribunal in the Palace of Justice, Nuremberg, Germany.

1.) From 26 November 1917, I have been employed in the I.G. Farben plant Ludwigshafen am Rhein as a specialist in the food branch, and during the war was acting head of the Storage and Supply Department. Apart from various catering installations, such as the community house, recreation center, plant kitchens, coffee kitchens, batelors' boarding houses, this department also administered the recreation centers in other places and facilities for sick persons, and saw to the purchase of food, etc. for all the installations.

2.) At the outbreak of the war, the Storage and Supply Department was assigned the duty of seeing for the accommodation and feeding of the plant employees brought in from the outside. In this connection the plant administration issued the directive that everything humanly possible should be done in order to make the stay of the "guest" workers in Ludwigshafen as pleasant and humane as possible.

In order to make possible the accommodation of the foreign workers assigned to us, in the coming years 7 large community billets (camps 1 - 7) with

(page 2 of original)

a total of 14,000 beds were procured. The administration of these camps was subordinate to the head of the Storage and Supply Department, Herr Prokurist WIENS, who died 6 February 1945, while I was responsible for the food and the purchase of groceries. After the death of Herr WIENS the general management of the Storage and Supply Department fell to me. 15 large kitchens, equipped in accordance with the most modern standards were used in the preparation of the food for all "guest" workers. Twice a day, at noon and in the evening, there was a full sized hot meal, which was eaten by the workers in the clean and pleasantly furnished dining-rooms directly next to the kitchens.

The workers, who could not leave their place of work for reasons connected with their jobs, received the same hot food brought to them in thermos flasks.

3.) The diet conformed primarily to the provisions of the Reich Ministry of Food and was based on the rates applicable for workers who worked long hours. Workers performing heavy and extremely heavy work received the prescribed special supplementary rations in the form of meat, fat and bread from the camp kitchens. Examples of the official publications are attached here as enclosures 1 and 2. Furthermore, we attempted to do additional services for the "guest" workers.

Thus, for example, the French civilian workers for a long period received through the plant

1 bottle of red wine daily.

The vegetables raised in large quantities on our agricultural enterprises

(page 3 of original)

were used additionally in the kitchens. In 1943, for example, for the plant kitchens

45,000,000 kg fresh vegetables

were used. Our agricultural enterprises were enlarged by us for this purpose during the war and equipped with large greenhouses, which were attached to our boiler houses.

As a result of additional purchases, the weekly ration per person of meat and sausage could always be increased by from 30 to 50 grams as opposed to the official rates.

On all holidays we endeavored to procure an especially good and sufficient food for the "guest" workers.

In the way of tobacco products and alcoholic drinks, the plant issued the following to the "guest" workers:

	<u>1942</u>	<u>1943</u>	<u>1944</u>
cigarettes, each	5,201,939	7,926,675	5,589,710
cigarettes "	-	27,900	-
tobacco in packs	152,325	129,935	124,285
cigarette paper in packs	22,700	11,000	68,350
wine in liters	58,349	30,468	11,560
German brandy 1/1 bottles	2,824	670	252
German brandy 1/2	1,354	9,045	60

(page 4 of original)

4.) The food was prepared by A-1 cooks. The specialties of the preparation of food such as the "guest" workers were accustomed to at home were provided to a large extent by bringing in cooks of the individual nations. Consideration was shown for all the religious practices of the few Mohammedan camp inhabitants by serving then salisbury steak, mutton or eggs instead of pork. The preparation of the weekly menu cards was made very carefully. In a weekly discussion at the office of the head of the department, the menu cards for the individual nationalities were discussed in detail and then approved. Menu cards in German and in the appropriate foreign languages were then brought for posting in all community kitchens and dining halls, so that every meal-ticket holder could see how much food he was getting. As samples, the following weekly menu cards still on hand are attached to this affidavit:

Enclosure 3: weekly menu of the general camp rations for the period from 22 to 28 December 1940

Enclosure 4: weekly menu for the general camp rations in the period from 21 to 27 December 1941.

Enclosure 5: weekly menu in French for the period from 30 August to 5 September 1942.

Enclosure 6: weekly menu for the general camp rations for the period of 20 to 26 December 1942.

Enclosure 7: weekly menu of the Italians for the period from 20 to 26 December 1942.

(page 5 of original)

Enclosure 8: weekly menu for the general camp rations
for the period from 19 to 25 December 1943.

Enclosure 9: weekly menu of the I.G. Farben hospital
for foreigners for the period from 24
to 30 December 1944.

A comparison of enclosures 3 to 9 will show on the one hand our effort to vary the food for the individual nationalities in accordance with the national taste, and on the other hand our effort to do something out of the ordinary on the Christmas holidays for the foreign workers for whom we provided. Naturally all the agencies of control repeatedly made sure that the foreign workers actually received what was listed on the menus.

5.) All kitchens stored one week's supply of food. Easily perishable food, such as meat, sausage, vegetables, milk and bread, was delivered daily and stored in cold-storage rooms. In various camps which were located in part outside Ludwigshafen on account of the air war, large supplies of food were stored in order to be in a position at any time to maintain the supply of food without pause, even if the kitchens and supplies were to be destroyed during the course of the war.

In spite of the frequently very serious destruction by air raids, we always succeeded in issuing hot meals to the foreign workers, often only by utilizing the services of all persons concerned with the food. As far as I am able to remember, there was an exception to this only on one single day, and this one time cold cut was distributed in the form of bread and sausage.

Document Book III WURSTER
Document No. 238

(page 6 of original)

We issued each "guest" worker two dishes, for the most part made of the best porcelain, which he used to rinse right in the kitchen with hot water, in order that he might take them back again with him clean to his living-quarters.

6.) In the community billets we had dispensaries for the foreign workers, and children's nurseries, which were required, to be sure, only by the Eastern workers. In the preparation of food, the needs of the patients and the small children were especially taken into account.

The caloric value of the food issued daily here in 1944 amounted to:

E. stern workers' children's nurseries			Dispensaries for the sick for the inhabitants of the community billets.
0 - 1 year	1 - 10 years	over 10 years	
1,541	1,809	2,222	3,080 calories daily.

Ludwigshafen am Rhein, 25 October 1947

Signed: Karl SCHMID

The above signature of Herr Karl SCHMID, residing in Ludwigshafen am Rhein, Friesenheimerstrasse 40, affixed before Dr. Wolfgang HEINTZELER, Ludwigshafen am Rhine, Bruckstrasse 13, is hereby certified.

Ludwigshafen am Rhein, 27 January 1948

Signed: Dr. Wolfgang HEINTZELER
Attorney-at-law

Anlage 1
Verpflegung

Im Jahr 1942

Verpflegungstabelle für Werkt. u. Lagerkämpfer gültig für die 54. Zuteilungsperiode vom 20. 9. bis 17. 10. 1943		a) Normalverbraucher	b) Kinder von 0-3 Jahren	c) Kinder von 3-6 Jahren	Kinder von 6-10 Jahren		Kinder von 10-14 Jahren		h) Regelmäßige Sonder- zuteilung für KLV-Lager	i) Lang- und Nacht- arbeiter-Zulage	j) Schwerarbeiter- Zulage	k) Schwerstarbeiter- Zulage	l) Lagerverpflegung	m) Nichtsowjetische Kriegs- gefangene					n) Sowjetische Zivilarbeiter und Kriegsgefangene					
					d) Normalrats	e) Regelmäßige Sonderzuteilung für KLV-Lager	f) Normalrats	g) Regelmäßige Sonderzuteilung für KLV-Lager						1. Normalarbeiter	2. Lang- und Nachtarbeiter	3. Schwerarbeiter	4. Schwerstarbeiter	5. Schwerstarbeiter unter Tage	1. Normalarbeiter	2. Lang- und Nachtarbeiter	3. Schwerarbeiter	4. Schwerstarbeiter	5. Bergarbeiter unter Tage	6. Landarbeiter
Fleisch	g	1000	400	400	1200	—	1200	—	—	800	1400	2400	1600	800	1520	1920	2320	2600	800	1200	1600	2000	2400	1000
Fett	g	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Margarine	g	200	—	—	187,5	18,75	187,5	18,75	—	80	150	475	—	874	930	1130	1330	1850	520	600	800	1040	1260	872
Butter	g	612,5	550	800	925	92,5	925	92,5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Butterschmalz	g	—	—	—	—	—	—	—	—	—	—	—	950	—	—	—	—	—	—	—	—	—	—	—
Speiseöl	g	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Schmalz	g	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Schweine-Rohfett od. Speck	g	62,5	—	—	—	—	—	—	—	—	250	1000	—	—	—	—	—	—	—	—	—	—	—	—
Roggenbrot	g	7300	—	2300	4900	490	8700	870	—	2400	5600	9600	10300	9300	10900	13020	14100	15700	10400	10400	13600	17600	17600	9500
Weizenbrot	g	2000	4400	2800	2200	220	2000	200	—	—	—	—	2000	—	—	—	—	—	—	—	—	—	—	—
Weizenmehl	g	—	—	—	—	—	—	—	120	—	—	—	120	—	—	—	—	—	—	—	—	—	—	—
Nährmittel	g	500	850	850	850	60	850	60	240	—	—	—	620	850	850	850	850	850	600	600	600	600	600	500
Teigwaren	g	A.	—	—	A.	—	A.	—	A.	—	—	—	A.	A.	A.	A.	A.	A.	A.	A.	A.	A.	A.	A.
Mehl auf Stärke-Grdl.	g	100	100	100	100	—	—	—	—	—	—	—	100	A.	A.	A.	A.	A.	A.	A.	A.	A.	A.	A.
Hölsenfrüchte	g	—	—	—	—	—	—	—	80	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Reis	g	125	—	—	—	—	—	—	—	—	—	—	125	—	—	—	—	—	—	—	—	—	—	—
Marmelade und Konfitüre	g	700	700	700	700	225	700	225	—	—	—	—	700	700	700	700	700	700	—	—	—	—	—	—
Zucker	g	900	900	900	900	180	900	180	140	—	—	—	900	700	700	700	700	700	440	440	440	440	440	700
Kaffee-Ersatz	g	250	—	250	250	—	250	—	150-200	—	—	—	250	250	250	250	250	250	100	100	100	100	100	100
Suppen-Erzeugnisse	g	—	—	—	—	—	—	—	160	—	—	—	320	—	—	—	—	—	—	—	—	—	—	—
Kakaopulver	g	—	62,5	62,5	62,5	—	62,5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Kartoffeln	g	14000	—	—	14000	—	14000	—	12000	—	—	—	28000	28000	28000	28000	28000	28000	28000	28000	28000	28000	28000	28000
Käse	g	125	125	125	125	31,25	125	31,25	—	—	—	—	187,5	125	125	125	125	125	—	—	—	—	—	—
Quark	g	125	125	125	125	125	125	125	—	—	—	—	125	125	125	125	125	125	—	—	—	—	—	—
Milch	l	—	1 l täglich	1 l täglich	1 l täglich	—	1 l täglich	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Entrahmte Frischmilch	l	n. A.	—	—	—	—	—	—	0,75	—	—	—	1,75	—	—	—	—	—	—	—	—	—	—	—
Eingedickte Milch	g	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Eier	Stück	n. B.	—	—	—	—	—	—	n. A.	—	—	—	n. A.	—	—	—	—	—	—	—	—	—	—	—

Anmerkungen:
 Die Ausgabe von Nahrungsmitteln als Teigwaren oder Mischungsprodukte ist in den einzelnen Produktionsabteilungen vorzunehmen. Die Ausgabe von Nahrungsmitteln als Nahrungsmittel ist in den Abteilungen der Nahrungsmittel keine allgemein gültigen Angaben gemacht werden. Auch die Zuteilung von Nahrungsmitteln an Kriegsgefangene und Ostarbeiter erfolgt nach dem in den einzelnen Abteilungen geltenden Verteilungsplan. Im übrigen ist die Verteilung nach den in den einzelnen Abteilungen festgelegten Verteilungsplänen zu erfolgen.

In 80k. Woche 238 Anlage 238

Verpflegungstabelle für Werks- u. Lagerküchen

geltend für die
64 Zuteilungsperiode
vom 26.6.44 bis 23.7.44

	a) Normalverbraucher	b) Kinder von 0-3 Jahren	c) Kinder von 3-6 Jahren	d) Normalersatz	e) Regelmäßige Sonderzuteilung für KLV-Lager	f) Normalersatz	g) Regelmäßige Sonderzuteilung für KLV-Lager	h) Regelmäßige Sonderzuteilung an Werkkühl	i) Lang- und Nachtarbeiter-Zulage	j) Schwerarbeiter-Zulage	k) Schwerstarbeiter-Zulage	l) Lagerverpflegung	m) Nichtsowjetische Kriegsgefangene:					n) Mitarbeiter und Sowjetische Kriegsgefangene:					
													1. Normalarbeiter	2. Lang- und Nachtarbeiter	3. Schwerarbeiter	4. Schwerstarbeiter	5. Schwerstarbeiter unter Tage	1. Normalarbeiter	2. Lang- und Nachtarbeiter	3. Schwerarbeiter	4. Schwerstarbeiter	5. Schwerstarbeiter unter Tage	6. Landarbeiter
Fleisch	1000	400	400	1200	—	1200	—	—	800	1400	2400	1600	1000	1520	1920	2320	2600	800	1200	1600	2000	2400	1000
Butter	200	—	—	250	25	250	25	—	80	150	475	—	675	930	1130	1330	1530	520	600	800	1040	1200	672
Butterschmalz	812,5	500	800	802,5	98,25	802,5	88,25	—	—	—	—	950	—	—	—	—	—	—	—	—	—	—	—
Speiseöl	50	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Schweine Rohfett u. l. sp. ck	—	—	—	—	—	—	—	—	—	250	1000	—	—	—	—	—	—	—	—	—	—	—	—
Roggenbrot*	6700	—	2600	4000	400	8100	810	—	2600	5600	9600	10390	9700	11600	13400	16100	16100	11000	11000	15000	17600	17600	9300
Weizenbrot*	3000	5100	3500	4000	400	2000	300	—	—	—	—	3000	—	—	—	—	—	—	—	—	—	—	—
Weizenmehl	—	—	—	—	—	—	—	—	—	—	—	120	—	—	—	—	—	—	—	—	—	—	—
Nährmittel**	600	600	600	600	60	600	60	—	—	—	—	1260†	600	600	600	600	600	600	600	600	600	600	800
Teigwaren	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Nährm. auf Stärke-Grdl.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hulsenfrüchtstett†	—	—	—	—	—	—	—	—	—	—	—	175††	175	175	175	175	175	—	—	—	—	—	—
Hülsengetreide	—	—	—	—	—	—	—	—	—	—	—	840	—	—	—	—	—	—	—	—	—	—	—
Marmelade und Kunsthonig	700	700	700	900	225	900	225	—	—	—	—	700	700	700	700	700	700	—	—	—	—	—	—
Zucker	900	900	900	900	150	900	180	—	—	—	—	900	700	700	700	700	700	440	440	440	440	440	700
Kaffee-Ersatz	250	—	250	250	—	250	—	150	—	—	—	250	250	250	250	250	250	Tea 30 M	Tea 30 M	Tea 30 M	Tea 30 M	Tea 30 M	250
Suppen-Ersatzg. etc.	—	—	—	—	—	—	—	—	—	—	—	300	—	—	—	—	—	—	—	—	—	—	—
Kakaopulver	—	62,5	62,5	62,5	—	62,5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Kartoffeln	n. B.	—	—	10000	—	10000	—	150 g tägl.	—	—	—	11200	11200	11200	11200	11200	11200	20000	20000	20000	20000	20000	14000
Salz	125	125	125	125	31,25	125	31,25	—	—	—	—	125	125	125	125	125	125	—	—	—	—	—	—
Stark	125	125	125	125	125	125	125	—	—	—	—	125	125	125	125	125	125	—	—	—	—	—	—
Milch	—	18 g tägl.	18 g tägl.	18 g tägl.	—	18 g tägl.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Entrahnte Frischmilch	n. A.	—	—	—	—	—	—	—	—	—	—	1,75 l pro Tag	—	—	—	—	—	—	—	—	—	—	—
Eingedickte Milch	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Eier	n. B.	—	—	—	—	—	—	n. A.	—	—	—	n. A.	—	—	—	—	—	—	—	—	—	—	—

Anmerkungen:
 * Die Zuteilung von Roggen- und Weizenbrot ist gebietsmäßig verschieden, die Gesamtmenge bleibt jedoch immer dieselbe.
 ** Die Ausgabe von Nährmitteln als Teigwaren oder Mähhilfsprodukte usw. ist in den ständigen Ernährungsamtgebüchern verzeichnet, es können daher für die Aufstellung der Nährmittel keine allgemeinen gültigen Angaben gemacht werden. Auch die Zuteilung von Nährmitteln an Kriegsgefangene und Ostarbeiter erfolgt nach dem in den amtlichen Gebietsverteilungsstellen. Sie liegen in der Gesamtmenge fest, in der die mittlere Zuteilung sind aber nach dem die Zeiten verschieden. †) Einzelstück der für die Kartellführung gewährten Mengen. ††) Die Stärke für Hülserfrüchte können von einigen EK auch in Reis gewährt werden, sofern Reis zur Verfügung steht.

Document Book III WURSTEN
Document No. 238

I.G. Ludwigshafen
Department of Storage and Supply

CAMP FOOD- 18 December 1940
Menu for the 52nd weekly pay period from 22 December to
28 December 1940.

Day	1st breakfast	2nd breakfast	bread	mon-meal	evening meal
Sun 22	1/2 ltr. real coffee 25 gr. butter 125 g. sugar	50 g sausage	500 g	soup hambur- ger, gra- vy, peas and car- ters, salt potatoes	50 g curry sausage rice soup with ve- getables
Mon 23	1/2 ltr. cereal coffee 50 g margarine	50 g sausage 25 g margari- ne	500 g	1 frank- furter sausage, yellow pea soup with potatoes	oatmeal soup tato alle, gravy sau- age with orknaut
Tues 24	1/2 ltr. cereal coffee 25 g butter	50 g sausage	500 g	soup 1 fried egg kale salt po- tatoes	fried sau- sage, ri- vy mashed potatoes
Wed 25	1/2 ltr. real coffee (handwrit- ten) 50 g margari- nade	50 g sausage 30 g margari- ne	250 g past- ry 250 g brend	soup roast pork gravy, baked po- tatoes	cold roast with ve- getables and dayon- naise po- tato salad
Thurs 26	1/2 ltr. coffee 25 g butter	50 g sausage	250 g past- ry 250 g bread	soup Hunger- ion goulash, salt po- tatoes	pickled roast gravy mashed po- tatoes
Fri 27	1/2 ltr. cereal coffee	50 g sausage 25 g margari- ne	500 g	macaroni tomato sauce salt po- tatoes	soup 2 potato patties goulash gravy
Sat 28	1/2 ltr. cereal coffee 25 g margarine	50 g sausage	500 g	ham sau- sage, ra- vy, kohl- rabi with potatoes	lent soup with need- les, roast brown, bak- ed potatoes

Distribute to:

Herr WIENS	1 copy	security council	5 copies
Herr SCHMID	3 "	after-work house	2 "
Herr Obering.	1 "	camp administration	15 "
HOFFMANN		Oppau 107	2 "
Herr Dr. KRAFT	1 "	Herr OLEART	1 "
Herr SCHROTT	1 "	Hausstr. 56	2 "
Herr KLEK	1 "	Leitpoldstr. 45	2 "
		Kitchen 839	2 "
			37 copies

Document Book III WURSTER
Document No. 238

I.G. Ludwigshafen
Department of Storage and Supply

16 December 1941

CAMP FOOD

Menu for the 52nd weekly pay period from 21 Dec. to 27 Dec. 1941

Day	1st breakfast	2nd breakfast	st bread	non meal	evening meal
Sun 21st	cereal coffee 31 g butter 200 g sugar	50 g sausage	500 g	soup chopped pork gravy cabbage potatoes in jackets	berley soup with vegetables and pota- toes 50 g dash sausa- ge
Mon 22nd	cereal coffee 31 g marger- ine	50 g sausage	500 g	pork sau- sage sauer- kraut po- tatoes in jackets	left-overs soup vege- table or- quettes gravy po- tatoes
Tues. 23rd	cereal coffee 31 g butter	50 g sausage	500 g	pea soup with ve- getables and pota- toes 100g rye bread	thickened farina soup smoked pork kale pota- toes
Wed. 24th	cereal coffee 31 g marger- ine	50 g sausage	500 g	stuffed cabbage paprika sauce po- tatoes in jackets	soup a la reine fried sausage red cabbage gravy po- tatoes
Thurs 25th	cereal coffee 31 g butter	50 g sausage	500 g	oliver soup roast pork gravy mix- ed vegeta- bles, potat- oes	sauerbraten roast pork gravy po- tatoes farina pudding with fruit sauce
Fri 26th	cereal coffee 31 g marger- ine	50 g sausage	500 g	barley soup ham- burger brown gravy 1 cucumber potatoes	lent gravy macaroni potatoes
Sat 27th	cereal coffee 31 g marger- ine	50 g sausage	500 g	Buechel- stein ve- getable stew 1 roll 50 g	thickened vegetable soup meat- balls gravy white turnips potatoes
		350	940	290	30 500

(page 95 of original, cont'd.)

Distribution schedule:

Herr WILMS	1	Herr Prok. ROFFMANN	1	Kitchen	838a	4
" SCHMID	2	" OLBERT	1	"	952	1
" Dr. KR. FFT	1	" PETRY	1	"	957	3
" KLEK	1	security council	2	"	886	2
" ERICH	1	camp administration	5	" Op	878	2
		plant home for young people				30
		Herr SCHOLL	2			

Document Book III WURSTER
Document No. 238

I.G. Ludwigshafen
Storage and Supply Department

CAMP FOOD 25 August 1942
Menu for the 36th weekly pay period from 30 August to 5 Sept. 1942

Day	1st breakfast	2nd breakfast	bread	noon meal	evening meal
Sun. 30.8.	coffee 175 g sugar 21 g butter 250 g margarine	-	300 g	hamburger gravy beet root po- tatoes	minestra à la Mi- lanaise (w. vege- tables and po- tatoes)
Mon 31.8.	Coffee, 21 g butter	50 g sausages	400 g	macce- roni fresh tomatoes boiled po- tatoes	meat-hash turnips mashed po- tatoes 40
Tues 1.9.	coffee 21 g butter	50 g sausages	400 g	veal hash carrots baked po- tatoes 40	vegetable and pearl- barley stew with potatoes
Wed 2.9.	coffee 21 g butter	50 g sausages	400 g	vegetable and potato soup à la pol- onoise	liver- dumpling with onions red cab- bage po- tatoes 40
Thurs 3.9.	coffee 21 g butter	50 g sausages	400 g	goulash beef with vegetables potatoes, gherkins, potatoes	1 egg curry ka- le po- tatoes in milk sauce
Fri 4.9.	coffee 21 g butter	62,5 g cheese	400 g	mixed salad po- tatoes	semolina fritters tomato- sauce potatoes
Sat. 5.9.	coffee 21 g butter	-	400 g	stuffed cabbage Hungarian sauce baked po- tatoes	meat-leaf gravy mixed vegetables potatoes 50

Distribution key 200.1 480.00 150.00 130.00

Mr. WIENS	1	Confidential Counsel	1	French Kitchen	810	2
Mr. SCHMID	1	Mr. BUCKER	1	laboratory		1
Mr. PETRY	1	French kitchen	5	assistant		----
Mr. KLIK	1					14

Document Book III WURSTER
Document No. 238

I.G. Ludwigshafen
Storage and Supply Department

CAMP FOOD

Menu for the 15 December 1942 Sch/F
52nd weekly pay period from 20 December to 26 December 1942

Day	1st breakfast	2nd breakfast	bread	noon meal	evening meal
Sun 20th	cereal coffee 175 g sugar 21 g butter	-	400 g	chopped veal cut- let Kahl- robi po- tatoes 40	Peasant soup w. potatoes and vege- tables
Mo 21st	cereal coffee 21 g margarine	50 g sausage	400 g	Red cab- bage gravy po- tatoes in jackets	Hamburger in herb-sauce savoy-cab- bage po- tatoes 40
Tue 22nd	cereal coffee	50 g sausage	400 g	Home style fried sau- sage Ben- dorfer sau. turnips salt po- tatoes 50	Soup fish steak w. vegetables and po- tatoes
Wed 25th	cereal coffee 21 g margarine	50 g sausage	400 g	Yellow pea soup with potatoes	Gulash with noodles potatoes 40
Thur 24th	cereal coffee 21 g margarine	50 g sausage	400 g	Peasant breakfast cold slow coco	Meatloaf gravy po- tatoes salad cucumber 40
Fri 25th	cereal coffee 21 g butter	62.5 g cheese	400 g	Roast beef gravy milk-car- rots po- tatoes 80	Soup, mac- aroni, tomatoe sauce po- tatoes
Sa 26th	cereal coffee 21 g butter	-	400 g	Scrambled egg green kale (gr- avy) pota- toes	Frankfur- ter sauer- kraut po- tatoes 50

Distribution schedule 200 W

Herr WIENS 1	Herr VLECK 1	Camp Administration	540 Fl. 170 Fl.	170 Fl.
" SCHMID 2	" OLBERT 1	kitchen III/868	4	
" PETHY 1	Pl at home	" III/878	3	
" Prokurist	f. young people	" IV/950	3	
HOPFMAN 1	Shop stewards	food storeroom	955 1	
" Dr. KRAFT 1	council 2	can f. female workers	1	

Kitchen I/928	1
" I/838a	3
" II/810	2
" II/952	2
" II/957	2
" IV/886	2

38

Document Block III MURSTER
Document No. 238

I.G. Ludwigshafen
Storage and Supply Department

15 December 1942 Sch/F.

CAMP FOOD.

Menu for the
52nd weekly pay period from 20 December to 26 December 1942

Day	1st Breakfast	2nd Breakfast	Bread	Noon Meal	Evening Meal
Sun 20th	cereal coffee 175 g sugar 21 g butter	-	400 g	Chopped Veal cut- let Spa- ghetti w. sage Per- nassan cheese 40	Peasant soup w. vegetables and po- tatoes
Mo 21st	cereal coffee	50 g sausage	400 g	Bavarian cabbage sauce po- tatoes in jackets	Hamburger with mac- aroni ve- getables and po- tatoes per- nassan
Tue 22nd	cereal coffee	50 g sausage	400 g	Home style fried sau- sage small turnips salt po- tatoes	Soup fish stew w. ve- getables and po- tatoes
Wed 23rd	cereal coffee	50 g sausage	400 g	Yellow pea soup with po- tatoes	Gulash with noodles and potatoes 40
Thur 24th	cereal coffee 21 g margarine	62,5 g Cheese	400 g	Peasant breakfast cottage slow	Heart of cabbage potato salad cucumber
Fri 25th	cereal coffee 21 g butter		400 g	Roast beef in burgun- der spachet- ti, potatoes pernassan- cheese 80	Scrambled egg green kale po- tatoes
Sat 26th	cereal coffee 21 g butter		400 g	Maccaroni in Italian sage pota- toes per- nassan	Minestrone w beef breast vegetables and po- tatoes 50

Distribution schedule. 200 w 540 Fl 170 Fl 170 Fl

Herr WIKS	1	Herr Frick. HOFFMANN	1	Food Magazine I	1
" SCHMID	2	Shop Stewards		Kitchen 838	2
" KLEK	1	Council	2	" 829	2
" PETRY	1	Sick bay No. 869	1	" 199	1
" OLBERT	1	Camp Management	2		
		Italian Bureau I	1		19

I. G. Ludwigshafen

Storage and Supply Department

15 December 1943 E/F.-II

CAMP FOOD

Menu for the

52nd weekly pay period from 1 December to 25 December 1943

Day	1st Breakfast	2nd Breakfast	Bread	Morn meal	Evening meal
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
32					
33					
34					
35					
36					
37					
38					
39					
40					
41					
42					
43					
44					
45					
46					
47					
48					
49					
50					
51					
52					
53					
54					
55					
56					
57					
58					
59					
60					
61					
62					
63					
64					
65					
66					
67					
68					
69					
70					
71					
72					
73					
74					
75					
76					
77					
78					
79					
80					
81					
82					
83					
84					
85					
86					
87					
88					
89					
90					
91					
92					
93					
94					
95					
96					
97					
98					
99					
100					

Sun 19th	cereal coffee 200 g sugar 21 g butter	-	500 g white	Mentloof gravy small white te turnips potatoes 30	Porina soup with vege- tables 100 g 100 g dark bread
Mo 20th	cereal coffee 21 g marga- rine	40 g sausage	400 g dark	Berley soup with vege- tables and potatoes	H...-sausa- ge gravy white cab- bage po- tatoes 40
Tue 21st	cereal coffee 21 g marga- rine	40 g sausage	400 g dark	Quaker oats soup with vegetables and pota- toes	Maccaroni in brown sauce schirobi (mashed) potatoes
Wen 22nd	cereal coffee 21 g butter	40 g sausage	400 g dark	Potatoes soup 15	Veal cut- let gravy sauce-cab- bage po- tatoes
Thur 23rd	cereal coffee Special ration 21 g butter	40 g sausage	500 g white	Needle soup with vegetab- les and potatoes 15	1 soft boiled egg spinach po- tatoes 100 g dark bread
Fri 24th	cereal coffee 21 g butter		400 g dark	vegetable stew with potatoes 15	Maccaroni sauce po- tatoes 100 g dark bread
Sa 25th	cereal coffee 21 g butter		500 g white	Fried pork gravy sauce-cab- bage with potatoes pudding with fruit sauce 60	Pea soup with vege- tables and potatoes 100 g dark bread
160 W			165 Fl		70 Fl-395 Fl

Distribution schedule

Herr WIENS	1	Herr Frick.HOFFMANN	1	Comp Messen	6	kitchen	III/
" SCHEID	1	" Kreischmann	1	Food Magazin	2	868	3
"Dr. KROFFT	1	Shop Stewards		Kitchen 1/829	4	kitchen	III/
" PETRY	1	Council	1	Kitchen	III/	878	3
" KLEK	1	Plant Home for		810	4	kitchen	IV/
" OLBERT	1	young people	1			1886	2
		Frl. NEIDLINGER	1			950	1
		Rest house	1			kitchen	VI/
						1076	2
						kitchen	La
						172	1
				kitchen OP	900	1	1
					12	107	1

Document Book III WURSTER
Document No. 238

CAMP FOOD
for Italians
(crossed out)

I.G. Ladwischafen
Storage and Supply Department
18 December 1944-P/OB.-III
I.G. Infirmary for foreigners

Menu for the
53rd weekly pay period from 24 Dec. to 30 December 1944

Day	1st Breakfast	2nd Breakfast	Bread	Noon meal	Evening meal
So. 24th	Coffee with milk and sugar 20 g butter	Coffee 35 g marmalade	300 g	Boiled beef potatoes small dish of vegetables 70	Soup ham warm potato salet 1 pee cake or roll
Mo 25th	Coffee with milk and sugar 20 g butter	Coffee marmalade 35 g	300 g	Roast meat gravy, vegetable potatoes icecream 80	Soup fresh sausage cheese 10 g bread
Tue 26th	Coffee with milk and sugar 20 g butter	Coffee marmalade 35 g	250 g	Stuffed meat sauerkraut or vegetable potatoes 70	Maccaroni gulasch sauce potato tatoes
Wen 27th	Coffee with milk and sugar 20 g butter	Coffee marmalade 35 g	300 g	White bean soup 50 g dark bread	Soup stuffed brawn 10 g margarine
Thurs 28th	Coffee with milk and sugar 20 g butter	Coffee marmalade 35 g	300 g	veal stew rice w. butter sauce 60	Soup white cheese potato tatoes in jackets
Fri 29th	Coffee with milk and sugar 20 g butter	Coffee marmalade 35 g	300 g	Potato gulasch spiced cucumber	Meatloaf gravy vegetable potatoes
Sa 30th	Coffee with milk and sugar 20 g butter	Coffee marmalade 35 g	300 g	Potato pancakes with apple sauce	Soup Lent-sausage 10 g margarine

Distribution schedule:

Herr WIENS	1	Herr Dr. STOLL	1	Sick boy	1
" SCHMID	1	Shop Stewards			
" KLEK	2	Council	1		9
		Bureau SCHMID	2		

Page 101 of original

Table concerning the food rations for various occupation groups in the war years and in 1947 with regard to contents of calories, excluding the special rations for heavy and very heavy workers.

Page 102 of original

COPY

A F F I D A V I T

I, Karl S c h m i d , businessman, residing at Ludwigshafen/Rhine, Friesenheimerstrasse 40, have been duly warned that I make myself liable to punishment by making a false affidavit. I declare herewith on oath that my affidavit is true and has been made in order to be submitted in evidence to the Military Tribunal at the Palace of Justice, Nuernberg, Germany.

I declare that the document No. 4, made in order to be presented ^{to} the Military Tribunal at Nuernberg, represents a table of the food rations of various occupation groups working at the I.G. plant Ludwigshafen/Rhine during the war years and in 1947 with regard to the contents of calories, excluding the special rations for heavy and very heavy workers.

I declare furthermore that this document has been drawn up based on data which was still available and is true.

This document does not contain the additional rations distributed on special occasions such as holidays and plant celebrations.

Ludwigshafen/Rhine, 22 March 1948.

(signed) Karl Schmid

The above signature of Karl Schmid, businessman, residing at Ludwigshafen/Rhine, Friesenheimerstrasse 40, affixed before me, Friedrich Wilhelm Jagner, attorney-at-law, is herewith certified and confirmed by me.

Ludwigshafen/Rhine, 22 March 1948 (Signed) F. W. Jagner
Attorney-at-Law.

Page 103 of original

COPY

A F F I D A V I T

I, Albert A. H u e l t e r , born on 18 October 1891 at Cologne-Muehlheim/Rhine, of protestant confession, residing since August 1945 at Ludwigshafen/Rhine Ebertstrasse 32, have been duly warned that I make myself liable to punishment by making a false affidavit. I declare on oath that my affidavit is true and has been made in order to be submitted in evidence before the Military Tribunal at the Palace of Justice, Nuernberg, Germany.

1. Following a stay of many years abroad, I returned in 1922 from Amsterdam to Mannheim and was until the beginning of the war co-founder and co-proprietor of the coffee import firm Gebrueder HUELTER in Mannheim. Among my customers was also the Storage and Supply Department of the I.G.Farbenindustrie at Ludwigshafen. With the beginning of the war, my firm was included in the general closing operation. From the middle of 1940 until the end of 1942 I was in the army as an interpreter and in January 1943 after a sickness of longer duration, I joined the I.G.Farbenindustrie, Ludwigshafen, Storage and Supply Department, as business and interpreter (for four languages).
2. After a short training period I was put in charge of the care and supervision of the kitchens and mess halls in the communal barracks. At that time approximately 12 large kitchens equipped with up-to-date facilities existed at the camps, which operated partly with steam and partly with coal or electricity. The number of

the German and foreign workers accommodated in billet camps who had to be fed every day amounted to up to 14 000 persons. Everyday at noon and evening warm meals were served, that is, approximately 28 000 meals a day.

3. The meals were served in spacious mess halls just as in a large restaurant. Mornings a warm coffee beverage was served, whereas the cold foods for the day (bread, butter, sausage, cheese, sugar marmalade etc.) were distributed already on the previous evening. On work days the dinner could be eaten in the mess halls of the plants, together with the German workers.
4. The menu, compiled for one week and made up at conferences where the most efficient utilization of the available foodstuffs was discussed at length was posted in each messhall in the native tongue of the various foreign workers partaking of the meals. The exact quantity of the meat-potatoes - vegetable-bread rations etc. was indicated, so that each holder of food tickets could inform himself exactly about quantities served him.
5. Each kitchen was put in charge of a first rate kitchen master, all of them with many years experiences abroad. Cooks as well as male and female kitchen help worked under their supervision. In each kitchen male and female personnel from the ranks of the foreigners also worked. The meals were cooked

Page 105 of original

therefore , by the foreigners themselves, and the tastes of the various nations were taken into account to a large degree. The preparation of the meals was made under extremely clean conditions. The procured foodstuffs were always fresh, of the best quality and were constantly checked. Meat and sausage were procured from first rate butcher shop, bread came from the large bakery of the consumer's co-operative and other larger bakeries just as all the other foodstuffs were purchased from renowned firms. The purchase of merchandise of inferior quality was never tolerated.

In order to avoid any shortage bread was always purchased in large enough quantities to last for 2 to 3 days. This was done in consideration of bombing attacks, because the possible destruction of the large bakeries would certainly have resulted in scarcities of bread. Because of the fact that bread was distributed daily to the workers, it is quite out of the question that the bread was stale or dried out. The short storage period only made the bread more wholesome and on the whole it surpassed greatly in quality the bread which is consumed nowadays in Germany. White bread was not stored, but distributed to the consumers on the same day.

For the storage of easily perishable foodstuffs each kitchen was equipped with large electrical refrigeration installations. The preparation of the meals was constantly supervised by foreign workers and their findings were entered in a check journal- The kitchen personnel partook of the same food as the other holders of food tickets.

Page 106 of original

I myself ate the same food against the food tickets. The provisioning of the foreigners working at the I.G. plant Ludvigshafen was widely known as being of first rate quality, which fact was also acknowledged by workers assigned to other factories.

6. The plant management paid much attention not only to the first rate provisioning of the workers assigned for work in the plant, but also to the most correct way of its distribution. On each distribution counter stood table scales and every consumer was entitled to have his ration of cold foods such as bread, butter, sausages, sugar etc. checked by re-weighing it. Alternating daily, I made surprise visits to the kitchens and messhalls and interviewed the workers personally, as to whether they were satisfied. Sometimes I was told of grievances because it could not be otherwise in a plant of such a large size. However, such grievances were in no comparison with the great mass of the provisioned people. Nevertheless such grievances were always carefully examined and if at all possible were remedied at once. Consequently, I was on the best possible terms with the foreigners of the various nations and according to my personal experiences I can only confirm that the entire work of the Storage and Supply Department was handled in the most correct manner.
- By order of the plant management, our chief at that time, Herr NIENS, daily inspected often also together with the plant manager Dr. JÜRSTER the storerooms and kitchens

Page 107 of original

tasted the food some times here and some times there and his interest in the welfare of the foreigners was beyond all limits. Nothing was good enough for them and he was on the run day and night. That is no exaggeration, but a fact which was known to every foreigner. The camp leaders who were assigned by the German Labor Front had no influence whatsoever on the kitchen management. By order of Herr Murster, they were not allowed to stay in the kitchens so that they were deprived of every opportunity of preferential feeding. However, they were allowed to forward grievances submitted to them by the foreigners to the chief of the Storage and Supply Department.

7. Those foreign workers whose places of work were located too far away from the numerous food distribution places, received their hot meals in large thermos food containers, which were forwarded to them in time for every meal. Even if it concerned only very small labor unit, the hot meals were forwarded in that manner. Obstacles in that respect caused by bad weather and later on by war events, were surmounted as far as possible. Everything simply had to work out all right and every single person of the many thousands of foreign workers plus the German workers were aware of nothing else than the fact that the meals and foodstuffs were distributed at the right time.
8. Concerning the distribution of meals I want to mention also that next to the distribution counters a special counter was provided for, where the kitchen personnel cleaned the mess kits carefully in running hot water.
9. If foreigners intended to take hikes on Sundays, they received against surrender of the food tickets, travel provisionings for such days.

Page 108 of original

Often they brought back fruit, grapes and even wine from such trips, because all were entitled to buy in addition unrationed food. I saw for instance many Eastern workers returning from the Rhein-Hardt railroad during the vintage period, loaded down with baskets full of grapes etc. I recollect this observation so vividly, because of the fact that I myself could get no grapes for my family.

10. In case the water supply was interrupted at times, several large water tank trucks were at once put in operation to bring in the necessary drinking water. However, it happened also that as a result of bombing attacks too much water was tapped from the municipal pipelines for the purpose of fire fighting and that therefore our water tank trucks could not be filled up within the city limits. In that case, they were sent to distant communities in order to get the water there. For that purpose the drivers of the water trucks- several trucks each with two tank cars, with a capacity of 10 000 tons each were available - were provided with a certificate on which the communities were asked to deliver water against future payment. The transport of water lasted at the most 1-3 hours and in that way every possible lack of water was avoided. However, in most cases the water trucks were already under way in times of danger of bombing attacks in order to bring in water from the outside, so that no interruption of the food distribution occurred at all.
11. Every mess hall was equipped with a canteen, where beer and lemonade, cigarettes and other tobacco products

Page 109 of original

were sold at the regular prices. I paid special attention to the fact that the beer glasses were filled properly. Nobody was to be cheated. Price tables were posted at the distribution counters in German and in foreign languages.

After working hours itinerant peddlars often assembled at the entrances of the camps or in the streets leading to the camps and offered items for the daily use, such as toilet articles, custom jewelry, refreshments also fruit and spicy vegetables such as onions, garlic etc, for sale.

12. All customary holidays in Germany were observed and celebrated by the foreigners as well as by the Germans. The Christmas celebration too was observed by all foreigners. In the mess halls, large Christmas trees were erected and the meals during those holidays were of a much better quality. Some of the foreigners were granted compassionate leave to be spent in their home countries. Those who had to remain in the camps received Christmas presents. In that connection I recollect that even at Christmas time 1944, each foreigners received a present consisting of foodstuffs, cake and sometimes also brandy.
13. As the war approached its close nothing was changed in the way of the provisioning of the foreigners, customary up to then. It was kept up that way and our interest in their welfare did not diminish until the last day.

Ludwigshafen/Rhine, 19 October 1947

(signed) Albert A. Huelter.

The above signature of Herr Albert A. HUELTER, residing at Ludwigshafen/Rhine, Ebertstrasse 32 affixed before me, Dr. Wolfgang HENTLER, Ludwigshafen/Rhine is herewith certified by me.

DOCUMENT BOOK III- JURSTER
DOCUMENT No. 1237

Page 110 of original

Ludwigshafen/Rhine, 27 January 1948

(signed) Dr. Wolfgang
Heintzeler
Attorney-at-Law

Page 111 of original

COPY

Excerpt from Prosecution Document NO-NI-6285,
Exhibit No. 1335, volume 69

Directorate Meeting at Ludwigshafen/Rhine on 31 January 1941.

(page 4 of the original)

.....

A report of the Nitrogen Department on the possibilities
of supplying the U.G. works concerns with frozen conserves
is submitted. The quantities purchased permit the assign-
ment of such vegetables even for the provisioning of
large works.

.....

The authenticity of the above excerpt is herewith certi-
fied by me.

Nuernberg, 20 March 1948

(signed) Dr. Wolfgang Heintzeler
Attorney-at-Law.

Page 112 of original

COPY

Storage and Supply Department 4 February 1941/.o

Subject: Kitchen for Italians, building B29.

After returning from my vacation, I found to my surprise that without approval of the kitchen master a storage room, where stockpiles were stored, had been used as a mess room for group-leaders (Kameradschaftsfuehrer). Not only meals were taken in that room, but the men even smoked there. In short, I found that conditions prevailed in that storage room which cannot be condoned under any circumstances.

I repeat what I urged upon the persons in question some time ago, namely that group leaders and co-workers of the Italian bureau should take their meals at a separate table, in the mess hall which should be set up at such a distance from the others that they cannot be disturbed during meal times by the Italian workers. In the course of time, I found out during my almost daily inspections that the mess hall was never so terribly crowded that our co-workers could not have a separate table provided for themselves. Moreover, it is solely a matter of education to teach the Italian workers that they are not supposed to disturb the group leaders during meal times. Beyond that it is the duty of a group leader to be a shining example for his own work-comrades led by him, not only concerning work, but also in the manner of partaking of his meals, as well as in his entire private life, as long as this life runs its course in the camp. If he would eat his meals in a separate closed room,

Page 113 of original

then the other work-comrades would rightly suspect that he was either getting better food or larger quantities than everybody else. This suspicion must be dispelled by facts. By the way, at this opportunity I want also to bring about a clean separation in that the kitchen and its work rooms should not be entered in general, also not by the group leaders. The kitchen master is the absolute boss of these rooms. Furthermore, he is in charge of the supervision of all matters connected with consumption of the dinner in the mess hall. The kitchen master is responsible only to me personally or to my deputy Herr Karl Schmid-concerning all matters connected with the preparation and the serving of the meals. The camp management should not interfere without compelling reasons in these matters and even in such cases only then, by reporting at once to me or to my deputy.

Normally the representative of the camp management should restrict his activity to see to it that the mess halls are kept clean, well heated and lighted, i.e. that a general order is upheld and adhered to; he should however avoid any kind of interference in the authority of the kitchen master.

Likewise, the distribution of provisions is under my supervision only or that of Herr Schmid. Here too, the camp management is not supposed to interfere.

This clean separation of duties is absolutely necessary. It is the more simple in its execution, because we have in the person of Herr Klimpel a kitchen master, who is in charge not only with kitchen No. 829 but also with the supervision of kitchen No. 839 and in addition with that of the two kitchens for the prisoners of war.

Page 114 of original

He is responsible for carrying out his duties in such a manner that a co-supervision of the camp management, which might have been practical at the time when the kitchens were set up, becomes unnecessary in the future. On such days when Herr Klimpel is off duty, Herr Bohnert will deputize for him.

(initial) W.

Distribution schedule .

1. Herr Klimpel
2. Herr Bohnert
3. Herrs Viens
4. Herr Schmid
5. Camp management
6. Italian Bureau to be translated for Guerrini, Fabbri, Aloisi, Herr Schlang.
7. Food distribution dept.

Copy

Excerpt from Prosecution - DOCUMENT No. NI-6287

Exhibit No. 1336. Vol. 69.

Meeting of the Direktion in Ludwigshafen/Rhine, 21 August
1941.

(page 4 of the original)

.....
Fifteen thousand warm meals per day are being served in the
existing installations; the RWA and the Plenipotentiary-General
for Construction work have approved the construction of a further
kitchen.
.....

The correctness of the above excerpt is herewith certified:
Nuremberg, 20 March 1948.

(signed:) Dr. Wolfgang Heintseler
Attorney-at-Law.

Exh. No. ...

Copy

20 October 1942

I.G. Ludwigshafen
Storage and Supply DepartmentSenior Camp Leader
Camp Leaders I, II, III, IV
Kitchens: 829, 838a, 952, 957, 810
878, 888 888Subject: Kitchens

After due consideration we have ordered that the camp leaders in general shall not interfere in the management of the kitchen. The only exception will be in the event a camp inhabitant should come to the camp leader with a complaint. In such a case the senior camp leader, together with the complainant and possibly with an interpreter, shall go to the person in charge of the kitchen and investigate the complaint. Should complaints be submitted at a time during which the head of the kitchen is not present, for example, when breakfast is being served, then he is to go to the German representing the head of the kitchen at that time. If this should be a complaint involving too small a portion of sausage, then after having weighed the normal sausage serving, he is to place this next to the serving about which the complaint was submitted so that it may later be examined together by the head of the kitchen and Herr Petry. The complainant shall immediately receive a normal serving.

These matters should be handled in general in such a way that a fair solution in the interest of the reputation of the Storage and Supply Department may be arrived at. It does not have to be decided immediately on the spot

Exhibit No. ...

whether the fault lies with one person or the other but
simply that the camp inhabitant in question be accorded
his rights. The general decision may be made later.

(signed) W

Exhibit No. ...

Copy

15 January 1943

I.G. Ludwigshafen

Storage and Supply Department

(Italian and Czech texts on page 118, of the following)

To our fellow workers in the Communal Camp No. 1

In order to eliminate the differences regarding the varying weight of the daily bread portions and to comply with the many wishes expressed, we want to attempt to distribute bread portions in whole loaves weighing 1200 gms. for a period of three days.

Consequently, every individual must divide his bread ration for each day and keep the bread in his locker in such condition that it will not dry out too much and not be stolen. Every four-team days we shall, as before, issue one loaf of white bread weighing 500 gms. once on one weekday which shall be scheduled for one day.

Further details may be found on the weekly food charts which will be hung in the dining room.

No changes will be made in the distribution of rations for heavy and heaviest workers.

Storage and Supply Department

(signed:) Wiers

Exhibit No. ...

Copy

8 February 1944

To all kitchens.

322

To the Kitchen Heads.

Subject: Distribution of Sugar.

A complaint is to be made with respect to the distribution of the sugar ration. Therefore, it will be made incumbent upon the kitchen heads to take particular care that the camp inhabitants being fed shall actually receive those quantities to which they are entitled.

Further, the employees are to be requested, when picking up their sugar ration, to use such utensils which will guarantee that the correct weight will be distributed. In this connection the variations of weight in the cases of fine- and coarse- grain sugar must be taken into account. Therefore, quantities are to be subject to frequent check through weighing.

Storage and Supply Department

(signed:) Signature

Exhibit No. ...

Copy

I.G. Farbenindustrie Aktiengesellschaft

Storage and Supply Department

21 September 1944/ wo.

To Camp Leaders

I, II, III, IV, VI, VII,

6

Gotheschule Op.,

1

To all group leaders

30

Kitchens I, II, III, IV, V, VI, VII

7

further, for the information of

The Senior Camp Leader,

1

Herr Beal, Shop Stewards' Council

1

Office Schmid

- 3 -

49

Subject: Keeping Coffee on hand if Drinking Water is Lacking.

As long as no drinking water is available in the various camps and as long as beer can be purchased only in limited quantities, kitchens are to keep coffee available which will be served free of charge during the time meals are being served.

(signed:) Wlons

CopyA f f i d a v i t .

I, Susanno H a b s l e , born 18 October 1914, in Velke Pole, house number 256, in Czechoslovakia, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nuremberg, Germany.

In October 1941 I reported voluntarily to the Employment Office in Velke Pole for labor allocation. They gave me a position in the kitchen of the I.G. Farbenindustrie Ludwigshafen/Rhine. Everything which was promised to me in the Employment Office in Velke Pole I found in Ludwigshafen, and all promises were kept.

I worked continually in the kitchen of Camp I. In this camp the following were fed: Italians, French, Dutch, Belgians (Walloon and Flemish), and sometimes also Czechoslovakians. Because of the effects of the war the various nationality groups were dependent upon our kitchen. Everything was handled decently, correctly, and smoothly in the serving of meals; although I was almost always present I never detected any kind of altercations between Germans and the foreign workers. Among the kitchen personnel there were the following: Germans, Czechoslovakians, French, Croatians (Yugoslavians), and Dutch, and also two Eastern female workers. We all got along very well and made up, so to speak, a family. Everyone received his proscribed ration. I never heard complaints even though I knew many people who partook of these meals since I was employed at noontime and in the evening.

Exhibit No. . .

at the time meals were being served. All food supplies were always fresh and were stored in clean stock rooms. The German superiors came regularly on various days and at various times to inspect the meals.

Ludwigshafen/Rhine, 13 October 1947

(signed:) Habale Susanna

The above signature of Fraulein Susanna H a b a l e, Ludwigshafen/Rhine-Frisenheim, Verdere Burgstrasse 20, affixed before the Police Precinct leader of Police Station 5b Ludwigshafen/Rhine, is hereby certified and attested to.

Ludwigshafen/Rhine, 13 October 1947

Police Precinct 5b

The correctness of the signature herewith certified:

Ludwigshafen/Rhine, 14 October 1947

(signed:) Signature

Police Sergeant

(Seal)

Foot: 1.-- RM

CopyA f f i d a v i t .

I, Margareta J e a n k a , born 12 March 1920 in Durreldorf, house number 144, Czechoslovakia, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made to be submitted as evidence for the Military Tribunal in the Palace of Justice, Nuremberg, Germany.

In 1941 the German Employment Office in Czechoslovakia sent out a call asking who wanted to work in Ludwigshafen. Thereupon I reported voluntarily and was then sent to I.G. Farbenindustrie. I was always decently treated and was always satisfied. I am acquainted with Frau Louis H a b e l o ; however, I also got along quite well with the other foreigners who were working in the kitchen of Camp I, although we first had to overcome the language barrier. The plant management was always interested in seeing that the people who partook of the meals were well fed. I never heard complaints although I was employed at the serving of meals. I never heard anything of mistreatment; on the other hand I know from the incidents that took place in the daily course of events that mistreatment and the like never occurred. Even under the war conditions the serving of meals was punctual. When an air-raid alarm was given the women first left the kitchen, then the male personnel, and finally the German superiors. I can only say that we were always well treated.

Exhibit No. ...

If something was troubling us we were always helped.

Ludwigshafen/Rhine, 13 October 1947

(signed:) Margarete Joesko

The above signature of Frau Margarete Joesko,
Ludwigshafen/Rhine-Mundenheim, Doriastrasse 19, affixed before
Police Precinct Captain of Police Station 5b Ludwigshafen/Rhine,
is herewith certified and attested to.

Ludwigshafen/Rhine,
13 October 1947.

POLICE PRECINCT STATION 5b

The correctness of the signature hereby certified:
Ludwigshafen/Rhine, 14 October 1947

(signed:) Signature

(Stamp:) Police Sergeant

Exhibit No....

Copy

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT
LUDWIGSHAFEN/RHINE

Special Delivery Letter

To the
District Supply Office
Attention: Herr Dr. Busch,
Kaiserlautern
Bismarckstr. 57a.

14 October 1940. M.

Work Shoes for Foreign Workers.

We wish to refer to the discussion between our Herr Knestle and you on the 14th of this month, in which you were informed of the conditions prevailing at this time with respect to the procurement of shoes for our foreign workers. These foreign workers among our employees are Italians, that is, south Italians, who have a preferential status, Slovakian citizens, Lorrainians as well as Dutch. These workers arrived here wearing conspicuously poor shoes. We learned that they had been unemployed for a long time and apparently had no opportunity to get any new shoes in time. The Lorrainian workers suffered severely from the effects of the war because at the beginning they were evacuated and after their return found everything gone. All these workers were additionally assigned to us by the Reich offices to make it possible for us to fulfill the war production quotas imposed upon us. This is a particularly urgent case because up to the cessation of hostilities any allocation of foreign workers here was forbidden because of our proximity to the front, and the large number of the foreigners then assigned to us made it impossible to supply them in time with new shoes.

Exhibit No.

With the increasing cold weather the situation of these employees is now becoming serious. In particular, this threatens the undisturbed continuance of production since we already have numerous cases of illnesses due to colds, and many of these foreign workers are not able to find places of work because they have no shoes.

Since the quota of priority slips to which we are entitled for the procurement of work shoes is limited simply to our regular staff of workers, we therefore wish to request that you make an effort to have an additional special quota of 1,700 pair of work and street shoes approved so that we shall be able to satisfy the urgent demand. We consider a delivery period of approximately three months necessary.

Heil Hitler!

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT

(signed:) Weiss (signed:) I.V. Hoffmann

Copy to Herr Eckert

Copy to Herr Hostle

Copy

I.G. LUDWIGSEN
OFFICE PFEIFFER

For the files

21 October 1940

You will know that we are presently employing a considerable number of foreign workers in our plant. They come from areas which have been effected by the war, or which had considerable unemployment for many years, and therefore, these people have only an insufficient supply of clothing. What they need in particular, is footwear and underwear. There are also many amongst them who have only one suit, and a very light one at that, nor do they have an overcoat for winter wear.

In spite of all our efforts, we have not been able even in a small measure to procure the necessary clothing for these new employees of ours, and it is well known that footwear cannot be obtained at all. Therefore, I request you to actively support us in helping these foreign employees, thus proving your cooperative spirit.

It would be very gratifying if you could obtain any second-hand clothing, underwear, and in particular, footwear - even such items which need repairs -

(page 2 of original)

so that we could alleviate their most urgent needs with this intra-plant self-help action. We have with this intra-plant self-help action. We have employees who cannot come to work at all because they have no shoes, or they come to work barefooted or only with their stockings on. As difficulties are bound to increase as soon as the cold season approaches, we would request your early and speedy assistance.

Therefore, I wish to request you to deliver all available clothing, underwear, or shoes to the supply issuing office La 389 (Harr K. STEL, Tel.No. 3304).

In view of the extremely pressing need, which particularly applies to our Lorrainian, Italian, and Slovakian co-workers, I would request you to hand in your donation by 31 October 1940, if possible.

Signed: WURSTER

Copy

Document Book III WURSTER
Document No. 522

I.G. LUDWIGSHAFEN

To Director Dr. WURSTER
Director Dr. WEISS
Obering. HOFMANN

Our Reference No. Ludwigshafen on the Rhine
Storage and Supply Department W/J.

7 December 1940

Subject: Underwear-, Shoe-, Stocking-, and Clothing Supplies
for Our Foreign Workers and Employees.

Of the total complement of approximately 2000 foreign workers, only the ethnic German Lorrainians, who are treated as German nationals, have received clothing ration cards.

All other persons are in the possession of temporary personal cards, which we are holding in accordance with an agreement concluded with the economy office. We took the latter in our hands solely for the purpose of handling all difficulties arising from communicating with non-German speaking foreigners, thus relieving the economy office, and at the same time to bring about as far reaching a welfare action for these foreigners as is possible. The holder of a temporary personal card cannot simply walk into a store and buy the items he desires like any ordinary German with his clothes ration card, but must put in an application which might or might not be granted by the economy office judging his point values in a similar way as those of a German national in possession of a clothes ration card. If an application is rejected no action is taken at all, but if it is granted, a buying permit is issued which can be used to effect the purchase.

Ever since August we regularly obtained considerable amounts of buying permits for our foreign employees

(page 2 of original)

even to such an extent, that the economy office was apprehensive lest our German compatriots would be at a disadvantage if the foreigners were to be supplied at the present rate. However, I want to refer to various details in order to prove the amount of work involved in this specific sphere, and what difficulties we encounter in obtaining such clothing and shoes.

Since October last the Ludwigshafen Economy Office has declared not to be in a position any longer to issue buying permits for clothing to our offices, as these buying permits were presented at Ludwigshafen stores. They motivated their action with a statement according to which the city of Ludwigshafen has only insufficient stocks of clothing in the various stores, and that none of them can be released for foreigners. Repeatedly, I and the manager of the local economy office, Herr Dr. T. H. S., went to the regional economy office at Kaiserslautern, and when I failed to persuade them, I approached the Reich office for clothing and the Reich office for the leather industry, calling on them myself on Tuesday, 5 November in Berlin. To all intents and purposes my clothing procurement mission was unsuccessful; I was told that we would have to apply to the commercial department via the Ludwigshafen Economy Office. As for shoes, several promises were given us in Kaiserslautern, which, in turn, were backed up by promises given by the Reich Office for the leather industry. Meanwhile, another month has passed

(page 3 of original)

without any action having been taken by the Reich office for the leather industry in Berlin. It seems to me that these offices don't want to run the risk of effective action for alleviating a very real need. The quantities we have requested were certainly not very large, and I'm sure that the Berlin offices could not have assisted us if it had been otherwise.

Then I took the following course. On the premise that even in peacetime a large number of the Ludwigshafen population purchased in Mannheim stores, I have concluded agreements with Mannheim stores and was able to obtain such items of clothing as described below. This course includes the following procedure, according to which the Ludwigshafen economy office issues the buying permits, and I forward these buying permits to the respective Mannheim firm, then arranging for the employee to be informed in his native tongue that at such and such a place a buying permit has been deposited for him, with which he will be able to purchase the below mentioned items.

The following three groups will have to be noted down:

1. ENGELHORN and STERN, Mannheim, have made available as per 13 November 1940:

- 116 men suits
- 126 winter overcoats
- 28 waterproofs
- 4 jackets
- 26 pairs of trousers

This consignment altogether includes and covers 411 applications, for which a total of approximately 1500 buying permits would have to be issued.

(page 4 of original)

2. Department store Vetter G.M.B.H., Mannheim

78 men suits
28 winter overcoats
1 waterproof
14 wool jackets
1 jacket
10 pairs of trousers

This consignment includes and covers approximately
332 applications with 1200 buying permits.

3. Department store Defak G.M.B.H., Mannheim

84 men suits
76 winter overcoats
8 waterproofs
15 woolen jackets
6 jackets
18 pairs of trousers

The following items of this consignment have not
been covered as yet:

200 men suits
124 winter overcoats
7 waterproofs
3 woolen jackets
9 pairs of trousers

This consignment includes and covers 582 applications
with approximately 1700 buying permits. This shows
clearly that we are having considerable difficulties
in handling such consignments, as I simply do not
have the labor available. From the time of submitting
to the Unit Leader (Kameradschaftsfuehrer) up to the
issuing of the buying permits, even if all the people
concerned do their very best, a total of three to four
weeks is bound to elapse. However, I do not consider
this a very important point,

(page 5 of original)

as we have already supplied a considerable amount to our foreign employees and an actual shortage, apart from winter overcoats, only exists in cases where the people themselves couldn't make up their minds.

We have issued a total of approximately 500 pairs of work boots, and other applications are being prepared and considered. We ourselves have acquired 300 pairs of shoes, of which approximately 200 pairs will still be left after the present applications have been settled.

Of course, it did happen that foreign workers either allowed the permits to expire, because they had meanwhile changed their mind, or that they went off and sold them without hesitation to some of their comrades. During the two plant meetings which I called for Wednesday, the 4th, for the Slovaks, and on Thursday the 5th of December for the Italians, I made a special point of this problem, and I acquainted them with the disciplinary action that would be taken in case of failure to comply.

In order to satisfy demands that have not yet been handled as far as clothing items are concerned, we have bought in Berlin the following booty items:

- 100 overcoats
- 182 uniform blouses
- 27 knitted jackets
- 71 pairs of long cloth trousers
- 100 pairs of woolen socks, bonded
- 20 men's tops
- 10 shirts

(page 6 of original)

I induced our purchasing department to contact representatives of clothing factories and to start negotiations with them which might be successful, so that I can expect to obtain for January 200 to 300 winter overcoats, and for February 500 suits of good and strong utility clothing at a sales price of approximately RM. 65 to RM. 70. It has not yet been ascertained whether the distribution of these overcoats will be handled by the Ludwigshafen stores, which would be the ideal solution, or whether we ourselves will have to handle the distribution of the clothing. In order not to be blamed for not attempting all possible means, we have taken over the distribution of 55 worn coats from the Ludwigshafen Economy Office, apart from distributing donated and worn clothing, which lot has meanwhile been sold. At the time when the promised suits and overcoats will be delivered, we should be able to comply with all justified requests submitted by our present employees.

Signed: TIENS

Copy

To: Director D. WEISS

Storage and Supply Department
R/C

3 January 1941

Today after asking your approval by telephone, I sent the following telegram to the Weiserauatern Economy Office:

On 14 October we submitted written applications for 1,700 pairs of shoes for foreign employees, which now are to be supplied by the economy offices in accordance with the Minister's decree number 123. After consultation on Friday, 1 November, with Dr. B UER, our Procurist Vienna approached the Reich Office for the Leather Industry personally on Tuesday, 5 November. Assessor DUEBKE definitely promised that a shipment was to be prepared. In spite of this two months had elapsed, and in spite of the fact that our representatives reportedly contacted Berlin both personally and by phone, and although they were promised after having urged them to settle the matter that this would be done, no steps have been taken so far. We urgently requested you to compel Assessor DUEBKE immediately by wire that he lives up to his promise, as conditions are becoming desperate. The weather bringing snow and rain is such that daily considerable production blocks are in appearance due to the absenteeism of foreign employees, which is intolerable in view of the importance of our manufacturing program."

Signed: W.

Carbon copy to: Oberling, HOFFMANN

Herr LESTER, Storage and Warehouse.

For the authenticity of the above copy.

Nuernberg, 20 March 1948

Lawyer

Copy

Document Book III MURSTER
Document No. 589

Excerpt from Prosecution Document No. MI-6285
Exhibit No. 1335, Volume 69.
Director's conference at Ludwigsafen on the Rhine on
31 January 1941

(Page 3 of original)

.....
The efforts of Vienna to supply the clothing needs of the
foreign members of the staff with garments of all kinds
have had very satisfactory results: some 3,000 clothing
coupons could be given out and honored.
.....

For the authenticity of above excerpt:

Fuornberg, 20 March 1948

Signed: Dr. Wolfgang
HEINTZELER
Lawyer

Copy

I.G. FARBE INDUSTRIE AKTIENGESELLSCHAFT

Personnel Department

Circular Letter No. 46 Ludwigshafen on the Rhine,
23 October 1942

To: the Section Chiefs, Plant Managers, Local Employees'
Representatives, and Party Functionaries (Antawalter).

Subject: Plant Collection of Furnishings for Our Communal
Camps and Hostels (Kameradschaftshohe)

Our German colleagues who have been drafted under the compulsory labor service act and the foreign employees working in our plants are largely billeted in communal - (barracks) - camps and in hostels (converted restaurants and school rooms). Even though these billets have been furnished as comfortably as is possible considering the prevailing conditions, there are still many items which could add to make our colleagues' stay there more comfortable and a substitute for their home life, as they are forced to spend their free time in these camps and hostels. All the regular plant workers are, however, interested in making things as homey as possible for our German and foreign colleagues in their leisure time, with the objective on the other hand, that these people will fully devote themselves to their work in the plant, which is the only way conducive to make them produce the output which can be reasonably expected of them.

Because of the fact that many items which would be useful for further decorating these billets cannot be obtained in the open market any longer, we urgently request our regular workers and employees to voluntarily collect and donate

(page 2 of original)

the following items - even though they might need repairs - thus making them available to the above-mentioned German and foreign colleagues:

- Pictures and picture post cards as well decorations
- Picture frames
- Ash trays
- Mirrors
- Flower vases
- Curtains
- Colored wall paper, etc.
- Decorative plates
- Material for various construction work
- Toys
- Books in all languages
- Knitting and embroidery material

In addition, we would like to mention that numerous foreign workers have entered the Reich without being adequately supplied with clothes, shoes, and underwear. It is also almost impossible to get in adequate clothing, etc. in the open market.

Although we know that our employees have already initiated a voluntary collection of shoes and clothing for foreign workers on one occasion last year, which was a full success and for which we are extremely grateful, and although we are positive that our employees have donated all their clothing material which they could possibly spare on the occasion of the last national collection of clothing material in the Reich, which material they donated from their own household-stocks, we would, however, request them once again

Document Book III WURSTER
Document No. 524

(page 3 of original)

to contribute to the above initiated collection with their donations of clothing, shoes, underwear, scarfs, blankets, etc., as much as possible. Of course, we are prepared to compensate them for any such items according to their value, if the employees should wish to receive payment for them.

Plant managers and Antswalter are herewith requested to thoroughly familiarize employees with the text of this circular letter. The items to be donated can be handed in the plant;

The following location has been picked as the central collection office.

Ludwigshafen on the Rhine, Prinzregentenstrasse
No. 40 (Store) On each work day from 1300
hours through 2000 hours.

It has been planned to finish this collection by
15 November 1942.

The Plant Manager
Signed: WURSTER

The Plant Employees Representative
Signed: RITTHALER
ve

Copy

AFFIDAVIT.

I, the undersigned ESKER BERMANN, residing Ludwigshafen on the Rhine, Pöschlarstr. 11, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice in Nuernberg/Germany.

On 17 June 1917 I started work with the Ludwigshafen - Oppau plant - the later I.G. Farbenindustrie - Aktien-gesellschaft; during the war I was chief of the pay office in Ludwigshafen. In this capacity I was also in charge of the wage computation for all foreign workers employed in the Ludwigshafen - Oppau plant. Dr. WURSTER as plant manager of the Ludwigshafen-Oppau plant regularly asked me to report to him on the financial position of the foreign workers and repeatedly gave me the strict directive in doubtful cases always to give the foreign workers the benefit of the doubt, since he personally was manifestly extraordinarily concerned about the well-being of the foreign workers. At present I can no longer recollect all particulars as to how upon Dr. WURSTER's initiative the foreign workers were helped financially, I do, however, quite clearly remember the following event:

Document Book III WURSTER
Document No. 124

(page 2 of original)

The question as to how long workers who were adversely affected by air-raids could be given paid leave in order to take care of these matters, had been settled by official regulations during the war. These regulations provided that German workers could be given about 14 days' paid leave, whereas foreign workers were entitled to paid leave for an essentially shorter period only - I think it was for about 6 days. When this regulation led to hardships for the foreign workers, Dr. WURSTER on his own initiative and at his own risk instructed me, contrary to the legal regulations, to give the foreign workers paid air-raid damage leave to the same extent as to the German workers. In some cases he even authorized me to go beyond the regulations valid for German workers. I remember one case where two French workers who had been completely bombed out were given by the plant about 18 days' paid leave.

Ludwigshafen on the Rhine, 23 September 1947

Signed: Oskar HEBMANN

The above signature of Herr Oskar HEBMANN, residing in Ludwigshafen on the Rhine, Loehlerstr. 11, affixed before me, Dr. Wolfgang HINTZLER, Ludwigshafen on the Rhine, Brunckstr. 13, is hereby certified and witnessed by me.

Ludwigshafen on the Rhine, 23 September 1947

Signed: Dr. Wolfgang HINTZLER
Attorney-at-Law

Copy

I.G. Farben
Cost Accounting Office
Ludwigshafen-Oppau

31 May 1941(?)

To
Department Chiefs, plant managers and plant technical
engineers
of the
Technical Department Ludwigshafen and Oppau,
Nitrogen Department, Shipping, Oppau,
Dyes Shipping Ludwigshafen, Communication Department
Ludwigshafen - Oppau.

Subject: Participation of foreigners in piece work.

According to experiences up to now certain guiding
principles have in practice proved to be good of which
we hereby inform the workshops and plants.

At the beginning the new foreign worker has to overcome
considerable difficulty in order to become familiar
with the workshop conditions and to make himself in
some degree understood to the German plant personnel.
For this reason it is expedient not to let the foreign
worker participate in any piece work for about 2 weeks.

After this period of orientation the foreign workers
are combined in groups of 4 to 5 men and assigned to
work with a German worker to complete their training.

The German worker at that time receives the average
of his earnings up to then. In making the cost calcula-
tions concerning the jobs which these groups are carrying
out additional time will be allowed corresponding to
the type and difficulty of the job. The working hours
of the German worker are not placed on the piece work
report of the foreigners group.

(page 2 of original)

By becoming better trained in their job the latter have the possibility of increasing their piece work surplus pay, whereas the German worker, independently of the result achieved by the group continues to receive the average amount of his earnings up to then. The period during which the foreign workers remain in this training group cannot be fixed exactly. However, a period of three months may be regarded as the maximum.

At any rate, foreigners will not be taken out of the group until they in the opinion of the German group leader and as a result of their output and the progress they have achieved are capable of working together with German members of the personnel on piece work.

The cooperative spirit of the foreigner employed together with a German worker on piece work will continue to be evaluated corresponding to his efficiency at a given time by allowing additional time for his work. This time allowance decreases in the course of time so that normally after a further three months the foreign worker may be regarded as equal to the German worker with regard to his output. The allocation to piece work simultaneously entitles the worker to participate in the full surplus earnings.

Foreigners whose output continues to lag behind that an assignment to a piece work group is out of the question should because of unsuitability be sent back or be employed in other places of the plant.

Signed: HOFFMANN

Copy
222

AFFIDAVIT.

I, HOFMEIER Georg, born on 17 July 1895, residing in
Ludwigshefen on the Rhine, Bluecherstr. 14, having
been duly warned that I make myself liable to punish-
ment if I make a false affidavit declare under oath
that my statement is true and was made in order to be
submitted as evidence before the Military Tribunal in
the Palace of Justice, Nurnberg, Germany.

Since 1910 I have been working with the Badische
Anilin- & Soda-Fabrik Ludwigshefen on the Rhine. I am
a mechanic by profession. Since 1935 I have been
a time study clerk in the plant machine shop in
semi finished products department.

As time study clerk I have to compute the job to be
carried out, i.e. to fix the working time in advance.
On the basis of a directive by the Direktion I had
during the war to enter an allowance of at least 30
per cent for a period of four weeks after the first
weeks of training for foreign mechanics who carried
out these jobs, an allowance of at least 20 per cent
for a further 4 weeks and then permanently an allowan-
ce of at least 10 per cent.

Treating each case individually, even a higher allowan-
ce could be granted independently of, and apart from,
these fixed periods according to the degree of the
engineering difficulty of the work.

This regulation always gave the foreign workers a
chance of making much money.

Document Book III URSTER
Document No. 222

(page 2 of original)

Although I as an antinazi was especially interested in the situation of the foreign workers, I never noticed that they were treated badly or paid badly. On the contrary, I must say that the mechanics in my plant were all treated and paid well.

Signed: Georg HOFMANN

The above signature of HOFMANN Georg, Ludwigshafen on the Rhine, Blücher str. 41, affixed before Friedr. Wilh. WAGNER, Attorney-at-Law, Ludwigshafen on the Rhine, is hereby certified and witnessed by me.

Ludwigshafen on the Rhine, on 6 Jan. 1948
Signed: F.W. WAGNER

Copy

AFFIDAVIT.

I, JUELLY Jakob, born 29 March 1892, residing in Ludwigshafen on the Rhine, Liebermannstr.3, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nurnberg, Germany.

I have been working with the Badische Anilin- und Soda-Fabrik, Ludwigshafen on the Rhine since 1926, to begin with as lathe operator and as of 1930 as time study clerk for lathe work in the Ludwigshafen main workshop.

As time study clerk it was my task in advance to estimate the working time for special lathe work and to put it down on a piece work slip.

During the war such work computed by me was carried out by foreign lathe operators as well.

Upon a directive by the Direktion I had in these cases to enter a training allowance of 30 and more per cent for each of these lathe operators at the beginning of his activity, and later permanently at least a 10 per cent allowance in consideration of the language difficulty.

This regulation placed the foreign lathe operators in a very favorable position, so that they could earn more than a comparable German lathe operator ..

Ludwigshafen on the Rhine, on 6 January 1948

signed: JUELLY Jakob.

Document Book III WURSTER
Document No. 221

(page 2 of original)

The above signature of JUELLY Jakob, Ludwigshafen
on the Rhine, Liebermannstr. 3, affixed before
Friedr. Wilh. WÄGER, Attorney-at-Law, Ludwigshafen
on the Rhine, is hereby certified and witnessed by
me.

Ludwigshafen on the Rhine, on 6 January 1948.

signed: F.W. WÄGER

Copy

AFFIDAVIT.

I, Paul WEISS, residing Linburgerhof, Brunckstr. 13 b, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Place of Justice, Nuernberg, Germany.

1. On 7 December 1917 I entered the then Badische Anilin- & Sodafabrik Ludwigshafen as mechanic's apprentice and in 1921 I was promoted to mechanic journeyman having passed my examination. Most of my work was concerned with machine building, temporarily also in the furnace repair shop. In 1939 I was given the job of time study clerk. Against the will of the plant management and upon the pressure of political agencies, I had to quit the time study office after four months because of my anti-fascist attitude, and upon Dr. WURSTER's intercession I was again employed as time study clerk as of 1 January 1941, to begin with in another plant until the end of 1941. Upon the application of Obering. LOFFELANN I was then given a position of time study clerk in the repair shop of the Ludwigshafen plant.

(page 2 of original)

2. There I had to do all the time study work for the German and foreign mechanics employed there. My job was to inspect the mechanic's job to be done, to compute the working time ~~it would~~ require and to enter ~~on~~ the piece work slip. On the basis of a directive by the plant management.

I had to enter special allowances for the foreign workers: for the
first 4 weeks 30 %
for additional 4 weeks 20 %
as training time,
for the remaining time of their employment 10 %.

Since, however, these allowances represented the minimum percentage, the time study clerk could also enter higher percentages and in cases, in which it seemed necessary to him he could grant allowances over and above 30 per cent. In agreement with the Direktion I made use of this opportunity in many cases, even after the time provided for training. On the occasion of frequent personal calls at the Direktion I never had trouble on this account; on the contrary, my efforts were supported. The Direktion wished that the foreign workers should not be in a worse position than a German worker and even if their work output did not fully reach that of German workers this was not to be held against them.

Document Back III LUKSTER
Document No. 291

(page 3 of original)

Ludwigshafen on the Rhine, 3 March 1948

signed: Paul WEISS

The above signature of Paul WEISS, Linburgerhof,
Brunckstr. 13 b, affixed before Friedr. Wilh.
WAGNER, Attorney-at-Law, Ludwigshafen on the Rhine,
is hereby certified and witnessed by me.

Ludwigshafen on the Rhine, 3 March 1948

signed: F.W. WAGNER
Attorney-at-Law

Copy

The Oberbuergermeister
of the City of Mannheim

Mannheim, 27 November 1940

To the
I.G. Farbenindustrie A.G.
Personnel Department
Ludwigshafen/Rhine

-Your letters of
21 August and
11 September 1940-

Subject: Foreign workers'
personal tax.-

The foreign workers accommodated in communal camps receive the same wage as German workers. However, the foreign workers' income is not taxed to the same extent as is the German worker's income by contributions, Winter Relief donations, etc. Neither are the foreign workers liable to the national defense tax (Wehrsteuer). With regard to their usual place of residence they may be compared to those German workers who on the basis of the decree concerning the reservation of manpower for tasks of special state political importance are allocated to service far from their place of residence. These must pay their full personal tax as fixed by law. For reasons of uniform taxation I am, therefore, unfortunately not in position to comply with your application for the reduction of the personal tax of your foreign workers to the lowest rate for persons not liable to income tax. However, I shall exempt the workers coming from the former Reich territory Alsace-Lorraine from the personal tax for 1940 beginning with the next pay period. The income tax cards for 1940 are herewith regarded as paid.

(page 2 of original)

With regard to the Slovaks mentioned in your letter of 11 September 1940 I refer to the circular decree by the Reich Ministry of the Interior of 12 September 1939 according to which persons who have moved from Slovakia and settled in a German community are subject to personal tax as of the day of their arrival if they are personally liable to taxation. Thus Slovaks can be exempt from the personal tax for 1940 only if they on 10 October 1939 had their permanent place of residence within the Protectorate Bohemia and Moravia or in a community of the remaining Reich territory which does not collect the personal tax.

The German Municipal diet in Berlin which I informed of the situation likewise expressed doubts with regard to your application for the reduction of the personal tax for foreign workers, because in other communities of the Reich as well foreign workers are employed from whom in principle personal tax is collected.

Copy of the letter from the German Municipal diet of 8 November 1940 is enclosed.

By order:
Signed: Signature
Mayer

DOCUMENT BOOK III, WURSTER

CERTIFICATE OF TRANSLATION

5 April 1948

We, William Zirkel, Ludwig Heymann, Elizabeth A. Johnson, Wera Solander, and Robert E. Clark, hereby certify that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of the DOCUMENT BOOK III, WURSTER.

William Zirkel
B-397926

Ludwig Heymann
35096

Elizabeth A. Johnson
B-397941

Wera Solander
20096

Robert E. Clark
B-397939

Case 6
Defense

TRIBUNAL VI

CASE VI

Document Book IV

for

Dr. Carl WURSTER

submitted by the Counsel for the
Defense

Attorney
Friedrich Wilhelm WAGNER

Attorney
Dr. Wolfgang HEINTERER

Heing



Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc. No.	Exh. No.	Contents	Page
		<u>Count III of the Indictment: Foreign Workers</u> (Continuation)	
		<u>Welfare Work for Foreign Workers in Case of</u> <u>Illness.</u>	
236		Affidavit of Dr. med. Karl KRAFFT, dated 28 January 1948. Till 1947, the witness was head of the medical department of the Plant at Ludwigshafen- Oppau. He described impressively the extensive measures taken during the war in behalf of foreign workers, with respect to welfare work and care in case of illness. "Without the personal assistance of Dr. WURSTER, my colleagues and I would not have been able to attend to the medical requirements of the foreign workers, to the extent that we actually did. It was in keeping with the tradition of our plant and was to a great extent an accomplishment of Dr. WURSTER's in a branch of the plant administration that was especially close to his heart".	1-14
218		Affidavit by Willi STIGEN dated 7 January 1948. The witness works in the health-fund department of the I.G. plant at Ludwigshafen- Oppau, and he describes the development of the sick rate of foreign workers on the one hand and of German workers on the other, during the war, as well as the reasons for the resultant differences.	15-18
5		Table of the sick rate of the personnel of the "Plants at Ludwigshafen and Oppau during the period from 1941 and/or 1942 to 12 March 1945, for Germans and foreigners separately. (A limited number has been submitted separately).	19
290		Affidavit by Willi STIGEN, dated 12 March 1948, for the identification of WURSTER Document 5.	20-21
530		Report dated 7 November 1942 by Dr. STOLL, the camp physician, concerning Community Camps I, II, III, and IV of the plant at Ludwigshafen- Oppau	22-23

(page 2 of original)

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc.No.	Exh.No.	Contents	Page
530		The report shows the extent of the medical attention which the foreign workers received in the I.G. Plant at Ludwigshafen-Opau	22-23
531		A letter by I.G. Ludwigshafen to the Reich Governor (Reichstatthalter) in Saarbrücken, dated 31 March 1943, in which the request is made for the dispensary of the Community Camp at Rottackerweg to be recognized as a hospital, so that the patients can receive the supplementary food rations provided for recognized hospitals. The letter shows the excellent equipment of the hospital set up by I.G. for the foreign workers.	29-31
528		File note of von HALL, dated 29 August 1941, in which he reports that he visited two Italians in the hospital, who had been wounded in an air-raid, and to their astonishment brought them a gift from the plant administration.	32
552		Letter by the State Board of Health in Ludwigshafen, dated 21 January 1948, "The equipment of the hospital established by the I.G. plant during the war, for its foreign workers was exemplary".	33
		<u>Religious Welfare Work.</u>	
114		Affidavit dated 18 November 1947 by Emil FLEISCHINGER, Catholic Priest in Ludwigshafen. The witness reports that Dr. WURSTER had requested a memorial service for French civilian workers who had been killed during a bombing raid. This incident, insignificant in itself, shows, however, clearly and unequivocally, that the members of the Board of Directors under the leadership of Dr. WURSTER had an exercised particular understanding and good will towards the civilian workers. I was therefore again and again able to hear only the best of reports, from the civilian workers as well, concerning the Board of Directors of I.G. Farben". The witness goes on to say that with the knowledge of the Board of Directors of I.G. Farben, he continued to conduct French religious services which he had instituted, even after they had already been banned by the Reich Government.	34-36

(page 3 of original)

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc.No.	Exh.No.	Contents	Page
		<u>Measures for the Promotion of Language Understanding Between Foreigners and Germans.</u>	
293		Affidavit, dated 11 March 1948, by Dr. ing. Friedrich LORENZ. Upon order of the Plant Administration, the witness worked at the Ludwigshafen Plant, on the special problem of languages understanding and he developed an entirely new method for this, in the form of an illustrated language primer. Upon order of the Plant Administration, the language primer was printed in about 10,000 copies and distributed to the foreigners free of charge. The witness goes on to mention the generous way in which numerous instruction courses were given to the foreign workers with the help of the language primer.	37-39
10		Language primer for foreigners, identified by WURSTER Document No. 293 (a limited number of photostatic copies of the language primer for Foreigners has been submitted separately).	40
		<u>Recreational Activities for Foreign Workers.</u>	
533		A letter by WIENS, Economic Department Ludwigshafen, dated 18 June 1941, containing the suggestion that radios be procured for various camps.	41-42
534		Letter dated 30 September, by WIENS, Economic Department, concerning presentation of sound-films in the community camps. The letter goes on to mention the camp band which gives popular concerts on Saturdays and Sundays.	43

Index for Document Book IV
for Dr. Carl WURSTER, Case VI

Doc.No.	Exh.No.	Contents	Page
536		Letter, dated 7 March 1944, by the Department for "Cultural Activity in the Camps" of the I.G. Plant at Ludwigshafen, with an attached annual report for 1943. The annual report shows that in 1943 there was an astonishing number of variety programs, concerts, plays, movies, sports performances, tournaments, storm-boat and other trips, for the foreigners. The report gives the number of 44-49 orchestras, theatrical groups, dance teams, singer groups, choruses, and soloists for the foreign workers. Finally the report mentions the establishment of language courses, libraries, arts and crafts rooms, etc.	44-49
537		Letter dated 4 May 1944 from the Department for "Cultural Work in the Camps", to all club leaders. This letter announces that there will be a request concert in the recreation building (this is the large club house for the personnel of the plant in Ludwigshafen), the proceeds of which are to go to the victims of air-raids in France.	50
8		Excerpt from the French newspaper, "Le Pont", dated 9 July 1944, which contains an extensive report with several illustrations of a sports festival arranged for the French workers of the I.G. Plant in Ludwigshafen, and in which German, Czech, and Polish sportsmen also participated. At the same time the report contains the impressions of the reporter concerning the camps for foreign workers of the I.G. Plant and concerning life there.	51-52b
<u>Documents relating to Prosecution Document M15915,</u>			
<u>Volume 69, Exhibit 1342.</u>			
571		Personnel Card from the Ludwigshafen Personnel Department, for Roger BLANC, a French worker. The card shows that after having been fined by the loss of a day's pay on 13 July 1943, BLANC was fined twice again for unexcused absence from work, on 21 August 1943 by the loss of four hours' pay, and on 11 November 1943 by the loss of one day's pay. Up to his release on 26 January 1945, BLANC was not sent to a work training correction camp. (A limited number of photostatic copies of the personnel card has been submitted separately).	53

(page 5 of original)

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc. No.	Exh. No.	Contents	Page
572		Personnel Card of the Personnel Department, for Andre SIES. The card shows that up to his release on 25 February 1945, SIES was not sent to a work training correction camp. The card also shows that on 12 July 1944, SIES was not released for service with the Waffen-SS. (A limited number of photostatic copies of the personnel card has been submitted separately.)	54
573		Letter dated 12 July 1944 from the Personnel Department at the Ludwigshafen Replacement Office of the Waffen-SS, which states that SIES cannot be released for service with the Waffen-SS.	55
312		Affidavit dated 22 March 1948, by Dr. Hans MOELLER. The witness states that SIES worked under him at the I.G. Plant in Ludwigshafen and volunteered for the Waffen-SS in 1944. The witness kept him from taking this rash step. SIES was never sent to a work training correction department.	56
569		File note of the I.G. Plant in Ludwigshafen, concerning a conference at the Ludwigshafen Labor Office on 30 April 1944. Workers cannot be dismissed for unsatisfactory work. According to the directive of the Labor Allocation Offices, such workers are to be dealt with by work corrective measures or punitive measures.	57-58
224		Affidavit dated 30 January 1948, by Karl WIEBER. In 1943, the witness belonged for a few weeks to the guard personnel of the so-called "Work Training Correction Camp" in Ludwigshafen-Opau. He states that this camp consisted of one hut in which 40-50 men could be quartered, and which contained at the most 18-20 men during the time that he was there. No one was sent there for more than 4-6 weeks. The State Police sent persons there, who had been guilty of grave violations of discipline, such as black-marketing. The guards were made up of three old men, mostly over 60 years of age. The inmates sent there by the State Police were treated decently and in a normal manner. HOCHREITHNER, the witness' successor, was indicted before a French Military Tribunal in Baden-Baden and was legally acquitted.	59-62
263		Affidavit dated 2 February 1948, by Attorney Dr. Paul BAUER in Baden-Baden.	63-64

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc.No.	Exh.No.	Contents	Page
263		The witness defended three men who had guarded foreign workers in Ludwigshafen during the war and had been indicted before a French Military Tribunal, - among others, HOOBESMITH. All three men, including HOOBESMITH, were acquitted. The witness does not know of any other proceedings before a Military Tribunal for incorrect treatment of foreigners at Ludwigshafen.	63-64
		<u>Work Protection for Foreign Workers.</u>	
538		Letter dated 19 December 1947 from the Industrial Inspection Board for the Palatinate, to the Ludwigshafen Plant. In this letter, the protection of foreign workers against accidents and injury to health at the Ludwigshafen Plant, is examined in detail. "Foreign workers were not used in preference to Germans for work with a high accidents rate or for work injurious to health, and this is clearly borne out by accident statistics." "Working hours for the foreign workers corresponded to the arrangement of shifts for the German employees. The Board of Directors, the Personnel Department and the Security Engineers carried out necessary measures for the protection of life and health in a correct and generous manner, traditional for BASF."	65-67
235		Affidavit dated 30 January 1948, by Dipl. Ing. Franz STEINHART, As Security Engineer of the Ludwigshafen Plant, the witness prepared a readily understandable extract of the voluminous accident prevention regulations, for the convenient use of the worker. Upon order from Dr. WURSTER, these "Instructions for the Prevention of Accidents" were also translated into foreign languages for the use of the foreign workers. The witness makes the general statement that Dr. WURSTER was as much concerned with the welfare of the foreigners as with that of the German workers.	68-70
13		Excerpt from "Instructions for all Workers for the Prevention of Injury to Health and of Accidents", dated September 1940, (See WURSTER Document No. 235) From the introduction: "These regulations	71-73

(page 7 of original)

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc.No.	Exh.No.	Contents	Page
		should not be considered as laws for the violation of which punishment will be exacted! They are rules and recommendations based on many years of experience, for the sole benefit of the highest possessions of the working-man: Health and Energy! The Plant Management."	71-73
		(A limited number of photostatic copies of these instructions in German, French, Italian, and Slovakian, WURSTER Document No. 13, 13A, 13B, 13C, and 13D is being submitted separately.)	
9		Fire hazard warning sign in 8 foreign languages (A limited number of photostatic copies is being submitted separately.)	74
234		Affidavit dated 26 January 1948, by Margarete MOLL. Upon order of the Board of Directors of the I.G. Plant at Ludwigs-hafen, the witness visited the families of various Italians who had died in Ludwigs-hafen, in order to give them the welfare generously provided for them by the I.G.Plant.	75-76
Documents concerning Prosecution Document SI-6315, Exhibit 1339, Volume 69.			

(page 1 of original)

227		Affidavit dated 29 January 1948, by Otto ECKERT. During the war, the witness was, and still is today as well, head of the Personnel Department for Workers in Ludwigs-hafen-Opau. He explains the fact mentioned during the Meeting of the Board of Directors on 19 April 1943 (Prosecution Exhibit 1339), namely that 85% of all Eastern workers were employed as heavy and very heavy workers. As many workers as possible were classified as heavy and very heavy workers, so that they could receive the corresponding supplementary food ration. As many plants as possible were classified as requiring "particularly disagreeable work involving the use of acids and other noxious processes" so that in spite of the wage-freeze, as many plant members as possible could receive the so-called "extra pay for disagreeable work". The witness states that during the first half of 1943, there was a danger that Eastern workers would be taken away and sent to Lorraine to work in heavy industry there.	77-81
-----	--	--	-------

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc.No.	Exh.No.	Contents	Page
		The Plant wanted to help the Eastern workers avoid this, by making use of the very statements quoted by the Prosecution.	77-81
553		Circular letter dated 13 April 1943, by the Personnel Department at Ludwigshafen, concerning the employment of Eastern workers. The letter refers to the fact that they were threatened with having to release male and female Eastern workers who were to be sent to Lorraine. "All that was left for us to do was to try to prove that all our male and female Eastern workers were assigned to heavy work or to alternating shifts (Wechselschicht) and could therefore not be exchanged for German women."	82-83
556		Circular letter from the Personnel Department at Ludwigshafen, dated 3 June 1943. The circular letter states that there is about to be an inspection of the distribution of labor at the factory. The authorities therefore assume that it would be possible to take a rather large number of female Eastern workers from us and send them to Lorraine. The Regional Labor Office will therefore try to prove to us, with every means at its disposal, that our workers (this means workers of all kinds) were not being employed on all jobs, in a manner corresponding to the present grave shortage. The opinion of the Regional Labor Office has probably been confirmed by statements and reports which it has received concerning inadequate utilization of man-power in our plants. It is therefore requested that preparations be made to prove that the "type of employment is in keeping with the established requirements."	84-85
		<u>Supervision of the Eastern Workers in particular.</u>	
564		Letter dated 2 April 1942 from I.G. Ludwigshafen to the Mannheim Armament Headquarters. The announcement is made that the employment of the Russian civilian workers - begun on 29 March 1942, - is very difficult, in view of the organization of the plant. Due to the shortage of billets, additional Eastern workers cannot be taken on for the present. As early as four days after the assignment of these first Russian workers, I.G. Ludwigshafen points out to the authorities that	

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc. No.	Exh. No.	Contents	Page
564		payment in its present form, due to the taxes imposed upon the Eastern workers, is not in keeping with the requirements. The Eastern worker must be given the opportunity "to earn adequate increased pay which he will also be able to keep".	86
591		Excerpt from the minutes of the meeting of the Board of Directors at Ludwigshafen, on 21 October 1942. Herr SCHAEFER of the Sales Department is ordered to make a detailed investigation concerning the employment of Eastern workers. Various measures are mentioned, which have already been taken for the improvement of the living conditions of the Eastern workers.	87
592		Excerpt from the minutes of the Board of Directors' conference at Ludwigshafen on 13 August 1943. Dr. WURSTER expresses the special appreciation of the Board of Directors for his work as special deputy for the employment of Eastern workers. Herr SCHAEFER's work, he said: "It is thanks to his work primarily that next to our original German personnel, we can today consider the Eastern workers as being among our best workers."	88
226		Affidavit dated 1 February 1948 by Kurt SCHAEFER. The witness speaks Russian fluently and during the war he was ordered by Dr. WURSTER to look after the welfare of the Eastern workers in the plant at Ludwigshafen-Opau. He described the great difficulties which had to be surmounted and the efforts of Dr. WURSTER on the one hand, to alleviate the at first very harsh government regulations for Eastern workers, and on the other hand, his untiring efforts to enable the Eastern workers to lead a decent life, within the scope of regulations - and sometimes even in violation of regulations.	89-102
122		Affidavit dated 23 September 1947 by Oskar HERMANN. During the war, the witness was head of the wage account Department for all workers including the foreign workers in Ludwigshafen. He describes in detail the efforts of Dr. WURSTER to improve the financial position of the Eastern workers, in spite of the oppressive government regulations.	103-106

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc. No.	Exh. No.	Contents	Page
144		Affidavit dated 21 November 1947 by Eugen MINZENMAY. The witness was Director of the Labor Office in Ludwigshafen. He states that Dr. WURSTER, more emphatically than any other Plant leader, again and again demanded that the Eastern workers received the same net pay as the other foreign workers.	107-108
590		Excerpt from Prosecution Exhibit 1339. Meeting of the Board of Directors in Ludwigshafen on 19 April 1943. The new local directives for the payment of Eastern workers are announced. The practical results are negligible. It is therefore decided that new steps will be undertaken.	109
511		Letter dated 26 January from the Secret State Police at Saarbrücken to the Plant Leader of the I.G. Plant at Ludwigshafen, concerning the employment of Eastern workers. The letter contains various reprimands, among them, the fact that the camp for Eastern workers is only partly fenced in. The Gestapo demands immediate elimination of the offenses mentioned and notification that the necessary changes have been made.	110
240		Affidavit dated 30 January 1948 by Heinrich FALLER. The witness was head of the Plant Guards at Ludwigshafen-Opau. He states that in spite of the reprimand by the Gestapo, according to WURSTER Document 511, the Plant Administration had not changed prevailing conditions in any way, because it was determined "to avoid as far as possible the harsh regulations of the Gestapo concerning the treatment of Eastern workers."	111-112
529		Inquiry directed by the Ludwigshafen Labor Office to the I.G. Plant at Ludwigshafen on 4 December 1942 and the answer from the I.G. Plant at Ludwigshafen on 6 December 1942, concerning the treatment of pregnant Eastern workers. The letter shows that long before the governmental authorities had concerned themselves with the problem, the I.G. Plant had made special arrangements for the female Eastern workers about to undergo confinement. In addition, the correspondence shows that there was a kindergarten - and a kindergarten teacher as well as a school for the children of Eastern workers.	113-115
213		Affidavit dated 23 October 1947, by Ludwig ZELL	116-118

Index for Document Book IV
for Dr. Carl WURSTER, Case VI.

Doc. No.	Exh. No.	Contents	Page
213		The witness had been a Slovakian soldier and had gone to work at the I.G. Plant in Ludwigshafen in 1940. In 1943 and 1944, he worked in the kitchen of the camp for Eastern workers. He states that the kitchen at this camp was the nicest kitchen in all the community camps. He also gives various details about the manner in which the I.G. Plant tended to the wants of the foreign workers.	
535		Letter by the Head of the Camp for Eastern workers to the Economic Department at Ludwigshafen on 5 September 1942, concerning arrangements for recreational activities for the Eastern workers. There is a youth group, a dance group, a dramatic group, a chess group, and a singer group.	119-120
532		Program at the camp for Eastern workers for the Christmas and New Year holidays in 1943. Among other things, the program lists 3 religious gatherings, 3 concerts, 2 plays, and a distribution of Christmas gifts on 24 December 1943.	121
514		Letter dated 7 November 1942, from the I.G. Plant at Ludwigshafen to the Reich Commissioner for Labor Allocation. The letter shows that the Plant Administration at Ludwigshafen was planning to arrange for a camp newspaper for the Eastern workers, the same as for the inhabitants of the other camps, but that this plan had met with the opposition of the Gestapo authorities concerned, due primarily to an article concerning children born in the camp. The Reich Commissioner for Labor Allocation is requested to intervene with higher Gestapo authorities.	122-123
15		Newspaper of the Camp for Eastern workers at the I.G. Ludwigshafen, for the Spring of 1944. The newspaper gives a thorough survey of the extent of the welfare given especially to Eastern workers in the I.G. Plant at Ludwigshafen. It shows the recreational activities, the encouragement of marriages among the Eastern workers, the baptism of infants of Eastern workers, religious assemblies of Eastern workers, installation of a nursery under the direction of a Red Cross nurse, and finally the comprehensive hygienic care provided for the Eastern workers. (A limited number of photostatic copies of this illustrated camp newspaper - both the German as well as the Russian edition - is being submitted separately as WURSTER Document No. 15 A and 15 B)	124-134

(Page 17 of original)

I herewith certify that the documents
contained in this Document Book are true
and correct copies of the originals.

Signature: Friedrich Wilhelm WAGNER

Attorney

Copy

Affidavit

I, the undersigned, Dr. Karl KRAFFT, born 16 October 1887, residing at Ludwigshafen on Rhine, Voehlerstrasse 10, having been cautioned that I render myself liable to punishment for false statement, hereby declare on oath that my statement conforms to the truth and that it was made in order to be submitted as evidence to the Military Tribunal at the Palace of Justice in Duernberg/Germany, for Case 6:

1. I have been in the services of the I.G. plant in Ludwigshafen on Rhine as plant physician since 1918 and for 15 years, until I was pensioned in 1947, I was in charge of the Medical Division.
2. With regard to social welfare the Ludwigshafen plant looks back on a proud tradition. Also in the field of professional hygiene and medical care for the personnel, the plant has done outstanding work in the course of its history, indeed, one can say that in some respect it was the forerunner of new trends.
3. When on 1 January 1938 Dr. MURSTER became plant manager of the Ludwigshafen-Opau plant, I came into close contact with him in my capacity as chief of the Medical Division. When Dr. MURSTER first took charge he assured me that he would uphold the noble tradition of the plant and give his special attention to medical concerns, and that he would always be available for me.

(page 2 of original)

if I had any worries or requests I wished to submit to him.
Dr. WURSTER kept this his promise in every respect, especially
in the war years to follow, during which I was faced with
difficult medical problems which could only be solved with
his assistance.

5. In 1940 the then I.G. Farbenindustrie Aktiengesellschaft
received the first contingents of foreign workers. The Household
Division of our plant was charged with accommodations and food,
I had to take charge of the medical care. To begin with this
constituted no problem. The foreign workers were members of our
plant health insurance and the same principles of the Reich
Insurance Order (Reichversicherungsordnung) which applied to
German workers also applied to them. As, in the event of illness,
they received compensations in kind and in cash, and the same
hospital service which was available for the German members
of our personnel, accompanied by their interpreters, the foreign
workers frequented the dispensary together with the German workers.
The situation only became difficult when on account of the
increasing number of foreign workers the rooms of the dispensary
did no longer suffice for consulting hours. It became necessary
to introduce special consulting hours for foreigners and to
appoint a special camp physician in the form of a plant physician.
For the time being there were consulting hours every day in Camp I
and a medical ward was installed which could house 10-12 patients
who had to stay in bed. However, soon enough also this medical
ward proved too small,

(Page 3 of original)

and as the city hospitals were continuously overcrowded it seemed more and more imperative to set up a special hospital in which sick foreigners could be placed under medical observation. I submitted my plans and wished in this direction to Dr. WUSTER. I thought of setting up a barracks hospital in which a number of beds would be available and which would offer an opportunity for consulting hours. I remember this conversation with Dr. WUSTER very well because, after having listened to my report, he not only approved my scheme wholeheartedly but also asked me time and again to do everything possible for the health of the foreign workers.

5. Our newly established hospital for foreigners contained the following rooms and equipment:

Reception room, waiting room, consultation room, first aid room, laboratory, massage room, dressing table, wash and shower room, clothing store room, water closets, bathrooms, sick rooms with 2, 4, 8 and 10 beds, electric light and bell system, nighttable with glass plates (washable), metal hospital beds painted white, 3 sets of bed linen for each bed, tables with the corresponding number of chairs on which the patients had meals served, furthermore in each room, according to size, 1-4 wash basins with running hot and cold water and central heating.

As far as the illness permitted, every patient got a bath upon arrival. He had to take off his clothes and exchange them

(Page 4 of original)

for hospital clothes (shirt, drawers, jacket, trousers and slippers). The patients' clothes were cleaned in the disinfecting plant. To prevent the spreading of germs within the hospital, also the luggage the patient brought with him was disinfected and subsequently, after issuing a certificate of disinfection, it was kept in the clothing store room until the patient was released.

The Hospital was run by a German camp physician who had his daily consulting hours here and who visited the patients every morning. Cases which had to be examined and treated by a specialist were transferred to specialists in town. The camp physician was assisted by foreign physicians (Frenchmen, Belgians, Dutchmen, Rumanians and Italians). Apart from the doctors, the hospital staff consisted of the following:

- 1 chief warden, in charge of administration.
- 1 German medical attendant,
- 2 German nurses,
- 5 - 7 foreign medical attendants,
- 1 typist (female) and
- 1 laboratory assistant (female) for blood and fecal tests, urin analyses etc.

6. The regular hospital food was supplied by the plant kitchen situated at a distance of about 100 meters, where it was specially prepared for the hospital. Due to the fact that following an inspection by the police authorities, the hospital was recognized as such, we received

(Page 5 of original)

supplementary rations of meat, butter, flour, farinaceous foods, white bread, milk and sugar, supplementary rations without which therapeutical diets could never have been carried through. These supplementary food stuffs were necessary alone on account of the fact that the number of gastric and intestinal diseases was relatively high, especially during the summer months, and effective cures could only be achieved through proper diet. The change from hospital diet to normal camp diet after the release was difficult; the patients frequently suffered a relapse and had to be taken to the hospital once more. We therefore introduced a so-called "special diet in the foreigners' hospital" which the convalescent consumed daily at the hospital under the supervision of a medical attendant, while the convalescent was given food to take to the camp for consumption between meals.

The normal hospital diet consisted of one.

1. Breakfast with coffee, milk, bread and bread spread,

2. Breakfast with coffee or milk, bread, cheese or sausage,

Dinner: soup, potatoes, vegetables, meat or farinaceous foods with fruit,

at 16.00 hrs.: coffee with bread and bread spread,

Supper: hot or cold and tea.

7. For the foreign women employed in the plants Ia and Up a hospital ward was installed in Friesenhein, which was cared for by the same German camp physician. The food was provided by the I.G. Feierabendhaus (recreation centre) and was selected according to the same principles as the food at the hospital for foreigners.

(Page 5 of original)

8. The work at the dispensary kept the camp physicians extremely busy. With the increasing number of foreign workers, the number of patients during consulting hours rose to such a degree that the rooms at the hospital no longer sufficed, so that we found that we had to make yet another hut available for these consulting hours.

Aided by a foreign assistant doctor and the required staff it became possible to hold the daily consulting hours at the dispensary hut situated in the immediate vicinity of the hospital. Each physician had his own consultation room with a common waiting room and a room where treatment was given.

9. In the spring of 1943 we had to extend the hospital and to increase the number of beds. It is obvious that the sick rate increased with the rising number of foreign labor. By way of expensive reconstruction and the building of annexes we managed to raise the number of beds to 113. In due course the hospital became exceedingly well organized and experiences gathered in the course of time gave rise to improvements. Gardens were planted around the hospital which were used for restrooms. The hospital kitchen was enlarged. The neighboring vegetable garden could be utilized to provide a modern diet, to supply vegetables and fruit so that we could serve salad as early as February.

As absenteeism from work increased on account of dental diseases and the teeth of the foreign workers were partly in very bad shape

(Page 7 of original)

and in need of medical attention, a dental clinic was established which was also in the immediate neighborhood of the hospital and which was placed in charge of a German dentist.

10. On 23 September 1943 Camp I burnt down after an air raid. All medical installations were destroyed save the dental clinic; the entire hospital and dispensary records were also destroyed. The hospital itself was hit by 10 - 12 bombs. The inmates were partly in the bunker and partly in a neighboring shelter. With the exception of minor injuries nobody was hurt.

As thus hospital and dispensary were destroyed in one blow, it was necessary to find emergency accommodations for the hospital patients. It was also necessary to start setting up a new dispensary so as to be able to continue with the consulting hours; a kindergarten in Friesenheim which belonged to the plant was immediately converted for this new purpose, so that the regular dispensary routine could be resumed there amazingly soon.

A few days after the above mentioned raid I approached Dr. MASTER again with new plans, wishes and worries. Accommodations had been found for the seriously sick, but to carry on with regular hospital treatment in the emergency quarters was out of the question. Transfers to the overcrowded hospitals could only be effected in serious cases.

(Page 8 of original)

I requested that a new hospital for foreigners with at least 120 beds be set up. The request was granted immediately and the execution was handled in the most generous manner. Only due to Dr. BURSTER's initiative could the building of the new camp hospital be started immediately. However, on account of continuous air raids it became June 1944 before the new hospital could go into operation, for the time being with 89 beds; it was constructed to hold 120. All experiences we had gathered for running a camp hospital, all improvements concerning equipment and allocation of space were taken into account and it is a matter of course that all public health regulations were observed.

So as to be independent of the central heating and hot water supply which was continuously out of order due to air raid damage, our own hot water system was put into operation. The reception, disinfection, hospital clothes, food was organized in accordance with the hitherto adopted methods. The wardens lived in the house itself and the maintenance and heating of the building was in the hands of a superintendent. Apart from the Sollyx lamps and apparatuses for hot air treatment there also was a trained masseur available whose duties included giving therapeutical baths.

11. Just when things in the new hospital had begun to run smoothly, another air raid on 5 September 1944 destroyed also this building completely, 3 months after it was put in operation and exactly 1 year

(Page 9 of original)

after the destruction of the hospital in Camp I. Thank God there was nobody killed this time, either, but we were suddenly faced with having to find emergency quarters for more than 60 seriously sick patients.

Through negotiations with the administration of the City Hospital we were able to install 58 beds as early as November 1944, namely in one story of the Pestalossi School, an annex of the City Hospital, after our own people had first repaired the damage there. Here, too, the camp physician was in charge; German and foreign medical helpers as well as 2 sisters did duty there. Serious surgical cases were transferred to the surgical department at the City Hospital. Here, too, the food was provided by the Household Division of our plant. A menu of this time, preserved by some chance - which in view of the even then very precarious food situation in Germany appears to us like a miracle - will illustrate what food the sick foreign workers received between 24 - 30 December 1944:

S. 24. Beef 70 grams, boiled potatoes, vegetables.	Soup, ham 50 grams, potato salad, cake or pastry.
M. 25. Roast beef 80 grams, sauce, vegetables,	Soup, fresh sausage 50 grams cheese 50 grams, butter 10 grams.
T. 26. Salt meat 70 grams, sauerkraut, potatoes.	Maccaroni, peas, potatoes.

(Page 10 of original)

- | | |
|--|--|
| U. 27. White bean soup,
50 grams of rye bread | Soup, sausage 50 grams,
margarine 10 grams. |
| T. 28. Braised veal 50 grams,
battered rice, gravy. | Soup, white cheese
potatoes in their jackets. |
| F. 29. Potato goulash,
spiced pickles. | Hamburgers 50 grams,
gravy, vegetables, potatoes. |
| S. 30. Potato patties,
stewed apples. | Soup, Bologna sausage 50 grams,
margarine 10 grams. |

.....

The air raids which became ever more frequent and concentrated soon destroyed also this hospital and made a transfer to the cellar of the building necessary.

12. As already previously mentioned, the dispensary for foreigners was transferred to a kindergarten in Friedenheim. Owing to the ever increasing number of patients during consulting hours, more space had to be made available through reconstruction, which, however, made regular work at the dispensary possible. But even this building was finally destroyed at the middle of August; here too, a direct hit destroyed almost the entire equipment and above all the card index of the patients. The time to follow brought nothing but an uninterrupted flow of changes; first of all the consulting hours had to be transferred to the Oppau dispensary until the dispensary rooms in Camp VI were completed. When this camp was destroyed, the dispensary was transferred to an inn. Finally also this house fell victim to the bombs; once again the equipment which had meanwhile been procured under great difficulties as well as the newly compiled card index were burnt. The cellars of the Oppau dispensary were used as an emergency station; we never got to setting up a new dispensary.

(Page 11 of original)

13. The Russian male and female workers were accommodated in a separate camp. Soon enough the originally small hospital proved inadequate; when the camp was extended in the spring of 1943, we therefore established fair-sized hospital barracks. The following rooms were at our disposal: 7 sick rooms, 1 examination room with laboratory, 1 dressing room, 1 room for massage and heat treatment (partial heat treatment, heat treatment applied to the head, treatment with Sollux lamps) 1 washroom, 1 bathroom with tub and showers, 1 bed-sitting room for the Russian doctor and his wife, bedrooms for the male and female nursing staff and toilets. Originally there were 60 beds, which number had to be increased to 70 to cope with the growing number of patients. There was a male and a female ward as well as a ward for patients suffering from tuberculosis which latter were isolated from the other inmates.

As the Russians lived as families, comparatively many children were born. Dr. WURSTER demanded that these children be given special care and assistance. A nursery was therefore established in 1943 in which all the babies found shelter and where their mothers also nursed them. However, as the birth rate increased, special barracks were built for children, containing 3 nurseries, 1 play room whose walls were decorated with pictures from fairy tales, 1 washroom with the necessary

(Page 12 of original)

extra rooms. There was an average of 70 children in the barracks. The diet of the children varied according to age and general state of health. It was not always easy to carry this through as many mothers did not have the real understanding for modern baby diet. The babies received the same food as the children of the German members of the staff, namely from the milk kitchen which prepared 22 different varieties and by which also the Russian babies benefited, regardless of any factors save doctor's orders, while the older children received plenty of vegetable meals prepared with the crop from the vegetable garden. There were plenty of cots with rubber linings, and diapers and little garments for changing. In front of the baby station there were playgrounds where outdoor treatment was given. Each child was given the prescribed dose of Vigantol. A Russian physician supported by a Russian assistant looked after the sick ward and the children's station, while the supervision was in the hands of the German camp physician. Furthermore, the following personnel was assigned to the sick ward: 3 medical attendants, 1 clerk and one laboratory assistant (female). One Russian children's nurse, 2 trained children's nurses, 1 laundry woman and 2 cleaning women took care of the children's station. It was supervised by 1 German trained nurse and 1 German medical attendant.

- 14/ Dr. WURSTEN attached particular importance to the prevention of epidemics. Time and again he asked for reports about sanitary conditions in the camp and he supported

(Page 13 of original)

the medical administration to the best of his ability. As it was of paramount importance to keep the camp and its inmates as far as possible free of lice, Dr. WURSTER ordered that disinfection rooms were installed. Thanks to the strict regulations which especially applied to delousing, it was possible to prevent a typhus epidemic; only 8 patients were reported, which is a very low percentage in view of the many thousands of foreign workers.

It is solely due to the sanitary conditions in the camps, particularly, however, to the permanent checking and disinfecting of the toilets, that there were hardly any reports of other serious contagious diseases. This was one of the reasons that the number of camp inmates who were unfit for work remained within normal limits. Indeed, was frequently lower than the percentage among the German workers living outside the camp. Since even towards the end of the war the Red Cross Organization lacked neither medicines nor disinfectants and appliances, it was possible to treat also the foreign workers most carefully.

15. I gave a rough sketch of the medical care foreign workers received in our plant during the war. Without Dr. WURSTER's personal help neither my associates nor I would have been in a position to give the foreign workers such medical attention they actually received.

(Page 16 of original)

I mentioned in the beginning that we were proud of the medical care the workers of our plant enjoyed, and I can now add that the medical welfare for our foreign workers in case of illness was also exemplary. It conformed to the tradition of our plant and it was greatly due to Dr. WURSTER's efforts in this particular field of the plant management which was especially close to his heart.

Ludwigshafen on Rhine, 28 January 1948

signed: Dr. KRAFT

I, Dr. Wolfgang HINTZELER, Ludwigshafen on Rhine, Bruckstr. 13, hereby certify and testify the above signature of Dr. Karl KRAFT, which he executed in my presence.

Ludwigshafen on Rhine, 28 January 1948.

signed: Dr. Wolfgang HINTZELER

Attorney-at-Law

Affidavit

I, Willi SIMSEN, born on 25 September 1895, residing at Ludwigshafen, Leuzghnerstrasse 22, have been duly warned that I make myself liable to punishment if I submit a false affidavit. I declare under oath that my statement is true and was made in order to be submitted to the Military Tribunal at the Palace of Justice, Nuernberg, Germany.

Since 1920 I have been employed by the Badische Anilin & Soda Factory of Ludwigshafen on Rhine. In 1922 I was placed in an executive position at the plant sick insurance agency and since 1943 I have been business manager and deputy head of the plant sick insurance agency of the IG Farben Industry Aktiengesellschaft, Ludwigshafen on Rhine, until, in 1946, that agency became a part of the General Compulsory Health Insurance Agency. One of my tasks was to keep current statistics on the patients. The normal sick rate was 3 to 5%. During the war, the foreign employees, who had to be members of the plant sick insurance agency, were also included in the statistics on sick rates. The prisoners of war were not insured with the plant sick insurance Agency, but received medical care from doctors of the German Wehrmacht; we, did therefore not keep any special statistics on the sick rate of the prisoners of war. During the first years of the war the sick rate was about equally high for German and foreign employees, i.e. between 5 and 6%. Minor differences in the status of health were due to the

(page 2 of original)

that the average age was different in the case of the German
and foreign employees. During the following years, when the
situation worsened, the number of sick persons also increased,
reached during the last months of 1944 and the first
months of 1945 and coincides with the days when airraids were
most frequent. During my frequent conferences with the board of
directors concerning the sick rate of the employees I always
pointed out the obvious connection between the airraids and
the increased number of sick persons.

There were first of all the consequences resulting from the de-
struction of means of transportation. Many of the employees who
lived out of town had no possibility to reach their place of work
and therefore reported sick; there were, furthermore, the conse-
quences of the destruction of apartments and other living quarters
as well as the insufficient number of physicians of the in-
dustry companies, and, last but not least, the impossibility to
exercise adequate control exercised over the sick employees through
authorized supervisors. When, after the occupation of Germany con-
ditions became slowly better, the sick rate dropped again to
an average of about 5 percent.

signed: Willi SIEGEN

The above signature by SIEGEN Willi of Ludwigshafen on Rhine,
Leuschnerstrasse 22, executed before me, attorney-at-law Friedrich
F. J. WAGNER of Ludwigshafen on Rhine is herewith certified.

Ludwigshafen on Rhine, 7 January 1948

signed: F. J. WAGNER

(page 3 of original)

Sick list of German and foreign workers employed in the La and
Oppau plants.

Fixed Day	Workers %	Workers and Employees (without foreigners) %	Foreigners %
31. 1.42	7,26	6,29	6,97
28. 2.42	7,33	6,47	6,07
28. 3.42	4,72	4,37	4,14
25. 4.42	4,24	3,85	5,02
30. 5.42	3,16	3,01	4,38
27. 6.42	3,36	3,22	5,09
25. 7.42	3,9	3,75	4,36
29. 8.42	4,6	4,11	5,16
26. 9.42	6,54	5,36	5,24
31.10.42	4,6	4,34	4,12
23.11.42	4,71	4,47	4,05
26.12.42	4,73	4,47	4,98
30. 1.43	5,69	5,06	4,34
27. 2.43	5,5	4,9	3,72
27. 3.43	5,08	4,51	3,17
24. 4.43	4,17	3,8	3,72
22. 5.43	4,26	3,89	3,19
26. 6.43	6,54	5,65	3,05
31. 7.43	6,32	5,44	3,42
28. 8.43	9,97	8,14	3,36
25. 9.43	10,63	8,83	3,58
30.10.43	8,3	7,17	3,44
27.11.43	8,54	7,45	4,35
31.12.43	5,68	7,34	5,24

(page 4 of original)

Fixed Day	Workers %	Workers and Employees (without foreigners) %	Foreigners %
29. 1.44	10,57	9,05	5,29
26. 2.44	10,73	9,19	4,76
25. 3.44	9,00	7,3	3,9
29. 4.44	8,04	6,95	4,1
27. 5.44	8,13	7,13	3,79
30. 6.44	7,92	6,87	4,61
29. 7.44	7,41	6,55	3,62
26. 8.44	6,28	7,14	4,08
30. 9.44	16,16	12,5	4,88
23.10.44	11,1	9,75	5,24
25.11.44	10,62	9,24	5,9
23.12.44	12,55	10,95	7,01
31. 1.45	25,3	20,25	10,26
17. 2.45	26,10	21,00	3,07
12. 3.45	19,25	16,09	4,4
4.10.47			

Description in form of tables of the

"Sick rate of the employees of the plant
Ludwigshafen on Rhine and Oppau during
the period of 1941 and 1942 to 12 March
1945, with separate listings for foreigners
and Germans."

(Special and limited issue).

Affidavit

I, Willi SEIGEN, residing at Ludwigshafen on Rhine, Leuschnerstrasse 22, have had my attention drawn to the fact that I make myself liable to punishment if I submit a false affidavit. I declare under oath that my statement is true and was made in order to be submitted as evidence to the Military Tribunal at the Palace of Justice, Nuernberg, Germany.

1. I was business manager of the plant sick insurance agency of the I.G. Farben Industry Aktiengesellschaft, Ludwigshafen on Rhine, from the fall of 1943 to the liquidation of that agency at the end of May 1946.

2. I confirm that the document WURSTER No. 5 which is to be submitted to the Military Tribunal No. 6 at Nuernberg is an exact and correct description of all existing statistics on German and foreign patients covering the period of 1941 to 1944.

For the year of 1941 joint statistics were kept for Germans and foreigners. Only since January 1942 separate statistics for sick foreigners were started.

Ludwigshafen on Rhine, 10 March 1948

signed: Willi SEIGEN

(page 2 of original)

The above signature of Willy SIMON of Ludwigshafen on Rhine,
Louschnerstrasse 22, executed before me, attorney-at-law
Friedrich Wilhelm WAGNER of Ludwigshafen on Rhine is herewith
certified.

Ludwigshafen on Rhine, 10 March 1943

signed: F.W. WAGNER

Attorney-at-law

7 November 1942 Dr. St/Rus.

Report on Camps 1, 2, 3 and 4.

The I.G. community camp consists of four camps. Camp 1 is occupied by:

	24 Germans	1712 foreigners
camp 2 by 450 "	"	1965 "
camp 3 " 399 "	"	1153 "
camp 4 " — "	"	1533 East Russians

total 873 Germans 6363 foreigners.

1196 prisoners-of-war (Poles, Frenchmen, Russians) are at the prisoner-of-war camp.

1617 members of various nations, among them 965 Germans are housed in 33 dormitories (Ludwigshafen, Oppau, Edigheim, Priesenheim, Oggersheim, Mundenheim).

As already stated in our former reports, camp 1 has an infirmary which originally provided for 46 beds, but receives reserve of eight additional beds. These 54 beds are constantly occupied by hospitalized patients and, since the number of camp inmates is still increasing an enlargement of the infirmary is absolutely necessary and will soon be started.

Since the opening of the infirmary on 27 March 1941, until and including 6 November 1942 a total of 2,356 patients were hospitalized there. The average length of treatment is still about eight to ten days. The patients remain in the infirmary until they have fully recovered and are able to work, and are then released and given 1-3 days when they are still considered as convalescent.

(page 2 of original)

All internal diseases as well as cases involving minor or medium surgery are treated here. During the course of the winter there were several cases of lobar and broncho pneumonia among the Croats, and partly also among the Italians. During the course of the summer cases of active and acute tuberculosis of the lung occurred especially among the Spaniards. These patients are taken care of in a so-called isolation room until they are taken back to their native country.

All cases of venereal diseases are given special treatment and, in an acute stage they are being sent to the municipal hospital of Ludwigshafen; if the disease is in a secondary stage, and there is no danger of contagion the patients receive clinic treatment by a specialist.

There were, during the summer, a great number of cases of diarrhea, which, however, did not result from typhus, typhoid or dysentery, as has been proven through bacteriological tests.

There is also an increase of cases of inflammation of the mucous membranes of the stomach, whereas stomach ulcers have been found only in rare cases. In the case of stomach ulcers the patients are being kept in the infirmary and are placed on a diet lasting from three to four weeks.

It is remarkable that those camp inmates who were already in a generally poor state of health when they came to Germany, are especially susceptible to stomach troubles.

Since the end of May of this year camp 4 has been occupied exclusively by East Russian men and women. The number of inmates is increasing constantly. From an original 120 the number increased during the past months to today's total of 1533 men and women. There are a few

(page 3 of original)

complete families with children among them. Those children who are still at school age are also being taken care of by us; there are about ten of them.

A certain number of East Russian women were already pregnant when they came to Germany; six of those have had their babies in camp 4. For this reason we have established sick station which consists in different rooms 30 beds for adults and 11 for children. Like in the infirmary of camp 1, the Russians in need of hospitalization are accepted into the sick station and are kept there until they have fully recovered. All cases of illness, internal as well as those requiring surgical treatment are being treated here, with the exception of cases requiring operations; East Russians are only accepted in the hospitals of Ludwigshafen and vicinity if they are emergency cases requiring operations. All other are to be taken to the collecting camp of Pirmasens-North; this, however, is connected with considerable difficulties in the way of transportation especially if they are urgent cases.

All maternity cases went without complications. Most of the women are able to nurse their own babies and if they have not enough milk the children receive the prescribed formulas from our canteen kitchen for babies.

We expect about twenty more births by the end of this year.

There is a special Russian infant nurse, whose place and field of work is separate from that of the other nurses and patients.

Every child has his own small crib.

(page 4 of original)

The East Russians have all sorts of illnesses, which, however, are not different from the illnesses observed among the Germans and the other foreigners. No infectious diseases (typhus etc.) have so far been discovered.

In general the state of health of the Russian women is a good one, whereas that of the men is much less satisfactory, in some cases even considerably bad.

We have six male and two female helpers, mostly foreigners, who take care of the patients at the infirmary and at the sick station for the Russians, there are one male and five female helpers at the Russian sick room.

There are official office hours at camp 1 for all foreigners of camps 1-3 who do not have to be treated in the clinics Lu or Op; two assistant physicians one a Flemish and one a Dutch doctor, are taking care of those patients. A Soviet Russian assistant physician helps to take care of the Russians. These assistant physicians work under the supervision of the camp physician in charge.

The camp physician personally makes daily visits to the individual camps, and gives his orders concerning the treatment and determines the date when patients are to be declared able or unable for work.

The camp doctor checks on the sanitary installations of as well as on the kitchens and he controls the proper preparation of the food and the diet.

In general one may well say that the sick rate of the foreigners in the camps 1-3 is almost the same as that of the German workers. The rate of sickness among the East Russians can be reduced considerably if the camp leaders exercise much stricter supervision

(page 5 of original)

over these persons. One may be correct in saying that in many cases there is a lack of willingness to work, although one cannot deny that lighter cases of sickness, may be caused through the climate, especially in the case of Italians and Algerians.

At the beginning of this year a disinfecting station has been completed at camp 1 and no foreigner is being accepted in the plant or, if he is ill, in the infirmary, without he and his clothes having been thoroughly disinfected. This is controlled by means of a so-called certificate of disinfection, which has to be handed over upon reception in the infirmary.

As before, there are constantly disinfections of the camps, the infirmary and the sick-room. The already existing number of bath and shower rooms as well as the installations for washing were increased and some were also installed in the newly built wooden houses. Every wooden house has flush toilets.

We are most concerned about the cleanliness of the East Russians.

The East Russians are liable, during their work, to fill their mess kits, old tin cans, containers etc. with all sorts of food, even spoiled food taken out of garbage cans, and to take that to the camp and to eat it there; since this might lead to infectious diseases, such as typhoid or diarrhea etc. we have ordered that all Russians are to be examined when passing the guard of camp 4 and are to have their leftover foods taken away from them.

(page 6 of original)

Every evening the Soviet Russians, under the supervision of the camp leaders, are made to take thorough care of their bodies. Once a week there is a general cleaning of clothing under supervision. It must be acknowledged that especially most of the Russian women are most interested in these measures and are often remarkably clean when they come to the doctor for examination.

Food in camps 1-3 is handed out in messhalls, separated according to nationalities and ^{the} quantities are to be considered as entirely adequate. The foreigners receive hot food twice daily. The heavy and heaviest workers and those working long hours are receiving additional rations of bread and meat. Through the Italian confederation the Italians receive bakeries, parmesan cheese and red wine. Every Italian receives four and a quarter liter of red wine per week. Beer, sodas and lemonades can be bought in limited quantities at the mess halls. There was an excessive consumption of alcohol in some isolated cases, which, however, is not of any major importance.

Since the 1 of April 1942 a special dental clinic has been set up for the foreigners in camp 1, which is run by a dentist and his assistant. They take care of the teeth of the foreigners.

In summing up I may say that the quarters of the foreigners are excellent, and their food is entirely adequate. The Soviet Russians are being fed according to the directives of the Reich Commissioner for Eastern workers.

(page 7 of original)

In the beginning there are usually some difficulties when the workers are assigned to work, since many of them are not used to working regularly and are apt to go on sick-call at the slightest opportunity. Since doctor's office hours have been established for the foreign workers separately from those for the German employees, persons who are not able to work can be taken care of much more quickly and medical check-ups through the camp physicians can be made much more effectively.

Signed: Dr. STOLL

Copy

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT LUDWIGSHAUFEN ON THE RHINE

Very urgent }

To:

Reichstatthalter of the Westmark

Saarbrücken

March 31st, 1943/8

Re: Recognition of the Sickbay of the Rottstueckerweg Farben
camp as a hospital.

In Farben's camp I, Rottstueckerweg, a sickbay for the foreign workers (Italians, Croats, Slovaks, Frenchmen) housed in camps I to III has been established since April 1941. The sickbay has so far contained 54 beds which number will have to be increased to 100 beds as medical care will have to be extended to the inmates of camps V and VI now in process of construction.

This sickbay, in addition to treating minor and more serious surgical cases, is predominantly for the treatment of patients with internal complaints, some of them of the gravest nature. Particularly influenza infections, pneumonia, malaria. The majority of cases are gastric and intestinal diseases, cures being effected by putting patients on regular hospital diets. The sickbay is segregated from the other wooden living houses and is not adjacent to any of them. Every patient admitted is disinfected and washed in the baths provided for this purpose.

(page 2 of original)

Every sick room contains basins with running hot and cold water. There is a large washroom fitted with showers and running hot and cold water for patients not confined to bed. Every room is properly ventilated and furnished with electric globes. The size of the rooms differs, some of them accommodating 12 beds, some 6 beds. Beds are enameled in white, there being a night table for 2 beds. There are also adequate seating facilities inside the sick rooms. Rooms are centrally heated.

The patients' food is prepared in the Italians' communal kitchen in camp I and taken to the sickbay in warmed containers. The distance is approximately 250 meters. In the sickbay there is another small kitchen in which the patients' diet is also prepared. Behind the shower room there are 4 water closets with urinals.

There is a special ward for patients with infectious diseases. As stated above, there has been a marked increase in gastric and intestinal diseases in the recent months as well as of pneumonia cases. It is very difficult to provide this type of patient with the proper diet without additional food allowances.

Document Book IV WUBSTER
Document No. 52
Exh.No.

(page 3 of original)

For this reason, we are entirely dependent upon the food office
granting us supplementary rations. These supplementary rations will
only be granted if the sickbay is recognized as a hospital.

We request therefore that this recognition as a hospital be granted.

Heil Hitler .

I.O.FARBENINDUSTRIE AKTIONSGESellschaft

signed: WEISS

signed: pp. HOFFMANN

Enclosure:

1 chart of the sickbay in FARBEN's Rottentuckerkweg camp.

Copy

File memorandum concerning accident report of 28 August 1941

LEUZI Michael (Italian national) from Bari Carado nr. Naples
date of birth: 12/10/1895; married, 6 children.

LEUZI Severine, date of birth 25 April 1922, single, son of above,
both resident in Mannheim, Hotel Wartburgospitz (sic),
employed in Op 160 Lamesa (Dr. LIESS3399).

In the airraid on Mannheim which took place in the night
of Aug 27 - Aug 28, 1941, a bomb fell in the left wing of the
Wartburgospitz hotel on the court yard side. Both Italians were
injured by collapsing masonry. They were taken to the Mannheim
Municipal Hospital.

LEUZI Michael sustained 3 fractured ribs on the left side.

LEUZI Severine suffered slight concussion and a contusion of
the left knee.

On August 29, 41, both the Italian fellow workers were visited
in hospital and given a present from the plant management
(a bottle of wine each). The injured men were very pleased
with the visit and expressed their surprise that they were
thus being looked after as they were foreigners. According to
the two injured men, the suits they wore at the time of the
airraid were very much damaged. Claims will be filed with
the appropriate authority by the "Vertrauensman" in agreement
with the supplies department (Wirtschaftliche Abteilung).

Persons visiting the injured men in hospital were:

Kamradenschaftsfuehrer JÄGER (DAF - German Labor Front)
Interpreter Iva NOTTI (Italian)
member of the Vertrauensrat K. BAAL

Ludwigshafen on the Rhine
29/8/41

signed: K. BAAL

Direktor Dr. WEISS, request this be forwarded to office of Dr.
WURSTER

Copy

Public Health Office
Ludwigshafen on the Rhine

Ludwigshafen on the Rhine,
21 Jan 1948
Doerrhorststr. 36, Public Health
Office
Postal account No. 20 004
Ludwigshafen on the Rhine
Tel.: 62521

Diary No.....

Public Health Officer's Certificate.

During the war the Ludwigshafen on the Rhine Municipal Hospital was alone competent to treat prisoners of war. No prisoners of war but solely foreign workers were treated in the hospital set up by the I.G. Farbenindustrie A.G. The equipment and facilities of this hospital were exemplary. No complaints about treatment, food and housing were ever voiced.

Sent:

Public Health Office
Ludwigshafen on the Rhine

signed: Dr. HATZFELD,
Ober Medizinalrat.

(also contained in volume V, p. 32)

CopyFAROEHAL AFFIDAVIT.

I, Emil FLOERCHINGER, catholic priest of the church of St. Martin's in Ludwigshafen on the Rhine-Opau, Kirchenstr. 8, born on 9 March 1892 at Dirmstein/Palatinate, have been cautioned that I shall render myself liable to punishment by making a false affidavit.

I declare on oath that my statements are true and I am aware that they are to be presented as evidence to the American Military Tribunal No. 1 trying case 6 in the Palace of Justice in Saarberg.

In 1943/44 when airraids on Ludwigshafen on the Rhine became more and more frequent and the bombs dropped more and more devastating, the camps maintained by the I.G. Farbenindustrie A.G., Ludwigshafen on Rhine, housing foreign workers, particularly French civilian workers, were not infrequently hit by bombs. Some people were killed.

Oneday a gentleman, and another time a lady, called on me, ordering on behalf of the management of I.G. Farbenindustrie A.G., Ludwigshafen on the Rhine, - Dr. Karl WURSTER was the chief executive (Direktor) at the time a memorial service to be held for the French civilian workers killed in the airraids. I was explicitly asked by the management to hold this service on a Sunday afternoon, so as to afford as many French civilian workers as possible the

(page 2 of original)

opportunity of attending this service.

I was extraordinarily pleased with this noble deed of the Farben management who thus displayed a truly commendable sympathy for the foreign civilian workers, a fact which at the time was readily acknowledged by the latter. I was of course prepared to comply with the management's wish in all particulars. A few weeks later I was asked by the management to specify the fee for the service which the management wanted to pay. One of the services had been ordered for the first Sunday in November 1944 (All Souls' month).

This incident, insignificant in itself, clearly and openly indicates that the members of the management of I.G. Farbenindustrie A.G., Ludwigshafen on Rhine, under the leadership of Direktor Karl WURSTER, displayed great understanding and benevolence in their treatment of civilian workers. It was for that reason that comments made to me on the management of the I.G. Farbenindustrie, including comments by civilian workers, were favorable throughout.

It should be noted that in 1944 the Reichsgovernment then in office had placed a strict ban on the holding of special services for foreigners.

(page 3 of original)

As the majority of foreign, particularly French, civilian workers were living in, or housed in a camp, within my parish and as these workers turned to me to take care of their religious needs, I had, with the help of my then chaplain who spoke French fairly well, set up a special French religious section in my rectory as early as 1941. I had placed my church and later on the emergency building we used for services at their disposal, not only for services but also for social purposes, even after the government ban had been issued. The management of I.G.Farbenindustrie A.G., Ludwigshafen on Rhine knew of this, and that is probably why they asked me rather than another clergyman to conduct the two memorial services for the French civilian workers who had died.

Ludwigshafen on the Rhine-Oppau, 18 November 1947

Roman Catholic Parish Office of St. Martin's
Church
Ludwigshafen on the Rhine-Oppau.

signed: FLOERCHINGER,
incumbent

7th Police station Ludwigshafen on the Rhine, 27 November 1947

This is to certify the authenticity of above signature.

signed: GOSSENHART
in charge of the police station.

Stamp of the chief of police.

Copy

Affidavit.

I, the undersigned, Mr. Ing. Friedrich LÖRKEZ, born on 26 May 1906 in Bruchsal, resident in Neustadt-Palatinate, Kaiserstr. 12, have been cautioned that I shall render myself liable to punishment by making a false affidavit. I declare on oath that my testimony is a correct statement of the facts, made in order to be presented as evidence to the Military Tribunal trying case 6 in the Nuernberg Palace of Justice.

- 1) I have been employed as an engineer by the Farben plant Ludwigshafen/Rhine since 1 April 1935.
- 2) When, in the course of the 2nd World War, many thousands of foreign workers were employed in the Ludwigshafen plant, the plant management, within the framework of its extensive welfare program for foreign workers, devoted its special attention to the promotion of linguistic understanding between the foreigners and the German employees. I myself was commissioned to apply myself particularly to the solution of this problem.
- 3) The attempt to solve the problem of linguistic instruction of foreign workers on known lines and using known methods soon proved that all known methods were unsuitable for prevailing conditions.

(page 2 of original)

and that, above all, there was a lack of suitable textbooks and educational equipment.

- 4) In the light of experiences gained in various experimental language teaching courses, the Farben Foreigner's linguistic handbook was evolved under my direction after extensive preparations, first of all for German-French. The plant management arranged to have approximately 10 000 copies of this linguistic textbook printed in the course of time and to have them issued to interested foreign workers free of charge. WURSTER Document No. 10 submitted to me represents a true photostat copy of this Farben Foreigner's linguistic handbook.
- 5) The linguistic handbook designated WURSTER document No. 10, is predominantly concerned with things of everyday life and contains but few statements dealing with the worker's job. It is in the first place adapted to the worker's private life, which fact shows that, in designing the linguistic handbook, the plant management was not so much concerned with increasing work efficiency as with the purely human problem of making life easier for foreign workers in Germany.
- 6) The linguistic handbook for foreign workers was used as the groundwork for numerous language courses, mostly held in the foreigners' camps in order to save them the

(page 3 of original)

walk to an outside place of instruction. Attendance at these language courses was of course voluntary. At one time, up to 40 courses were running simultaneously, all conducted by volunteers.

7. I would like to emphasize that the generous concern for foreign workers in the linguistic field in the Ludwigshafen plant would not have been possible, had it not been for the very special interest devoted by the executives to this as well as other welfare problems.

Ludwigshafen/Rhine, 11 March 1948

signed: LORENZ.

This is to certify and authenticate above signature, executed in my presence by Dr. Wolfgang HEINTZLER, Ludwigshafen on the Rhine, Bruckstr. 13.

Ludwigshafen/Rhine, 11 March 1948.

signed: Dr. Wolfgang HEINTZLER
attorney-at-law.

Document Book IV WURSTER
Document No. W 1a
Exh.No.....

Language manual for foreigners, identified by WURSTER
document No. 293.

(A limited number of photostats will be submitted separately).

Copy

Herrn Dip. Ing. Walter GÖBEL

Oppau Electric plant

Catering and Supplies Dept (Wirtschaftl. Abtlg)
W/J.

18 June 1941

Re: Italian dining room building 876.

I should be obliged to you if you would take steps to expedite deliveries for this dining room. The Italian members of our staff greatly feel the lack of radio loudspeaker facilities.

Re: Camp 3.

Please procure radio equipment for the community center in process of construction in building 868 of camp 3, similar to the one in operation in 839. This camp will be enlarged to accommodate 1000 beds. A second community center may be set up in the course of the expansion program. Billetting in the camp will start during July. Should procurement take any length of time, it would be advisable to use the equipment ordered for the prisoner of war camp which cannot now be used as Polish prisoners of war are not allowed to have radio facilities.

Re: Camp 4

This camp is being constructed along the Stoeckerweiher. The community center will be set up in building 886. Please procure radio equipment for this community center as well.

(page 2 of original)

Re: Camp 1 838 and/or 839.

As discussed with you some time ago, the Slovaks' community center will shortly be set up in Building 838. If the radio equipment ordered for the construction workers' cafeteria in building 839 is not yet ready for delivery, I would ask you to have the radio equipment available installed in 838. As the painters will start whitewashing building 838 in a few days, it would be expedient to settle the question of installing radio equipment well in advance.

signed: V (WINS)

signed: H.

To Procurist HOFFMANN for his information.

Copy

I.G. LUDWIGSHAFEN

To: Prokurist HOFFMANN

Our Reference: Ludwigshafen on the Rh.
Supplies Dept (Wirtschaftliche Abtlg.) 30 Sept 42
W/Rl.

Re: Recreational activities in the camps.

We have agreed with the works security detachment (Werkschutz) to have the projector for small-size sound films made available at certain times so that we shall be able to show a film to every national group in every camp once every three weeks. This includes both Eastern workers and prisoners of war.

At the same time, we intend to have popular concerts performed by the reconstituted camp orchestra on Saturdays and Sundays so as to provide entertainment for the idle hours of Saturday and Sunday as far as is possible.

signed: WEISS

To: Direktor Dr. WEISS
Prokurist HOFFMANN
National Socialist Association "Strength through Joy",
attention of Betriebsobmann, Party member RITHALER
Plant's paper (Werkzeitung)

I.G. LUDWIGSHAFEN

To

Director Dr. WEISS

Employees' Department

Our Ref. No.
31/M.

Ludwigshafen n/Rh.
7 March 1944

Enclosed, we take the liberty of sending you a yearly report of our department for cultural camp welfare for the year 1943. From this report you will see that, in spite of increasing difficulties, we have been successful in continuing the development of spare-time activities.

Enclosure

Plant Obmann

of the I.G. Farbenindustrie Aktiengesellschaft
Department of the Cultural Camp Welfare

Signed: As Deputy BAAL

Enclosure.

Enclosure

I.G. Farbenindustrie A.G.
 Cultural Camp Welfare

17 February 1944

Yearly report for 1943 concerning
spare-time activities in our
concentration camps.

1.) Performances by camp talent.

a) National holidays with hoisting of flags and
social gatherings.

14 March 1943 Slovaks.
 10 April 1943 Croats
 1 May 1943 Frenchmen
 (3 performances)
 23 May 1943 Bulgarians and Rumanians
 11 July 1943 Flemings
 17 July 1943 Spaniards
 (2 performances)

Religious holidays:

30 March 1943 Mohammedans

b) Variety programs:

Italians	3
Slovaks	3 x
Flemings	4 (2+3 x)
Bulgarians	1
Croats	8 (7+1 x)
White Rumanians	1 x
Frenchmen	73
Dutchmen	5
Galicians	3 (2+1 x)
Eastern workers	29
Prisoners-of-war	15

Separate performances
according to nationality:

a) National holidays	9
b) Variety programs	136
c) Concerts	6
	<u>151</u>

mixed (x) performances:

16

c) Concerts:

Italians	3 (2+1 x)
Spaniards	5 x
Slovaks	1 x
Flemings	1 x
Bulgarians	5 x
Croats	7 (1+5 x)
White Rumanians	5 x
Frenchmen	1 x
Dutchmen	2 x (1+1 x)
Greeks	5 x
Galicians	7 x
Poles	5 x
Eastern workers	3 (2+1 x)

total

167

Page 2 of original)

2. Performances by outside "Strength through Joy" troupes:

a) Camp performances

Italians	5 (4 1 x)
Spaniards	1
Flemings	1 x
Frenchmen	4
Dutchmen	1 x
Eastern workers	2
Prisoners-of-war	1 x

b) Performances at the recreation building:

Germans	2
Italians	3 x
Spaniards	3 x
Slovaks	3 x
Flemings	3 x
Bulgarians	4 x
Greeks	3 x
White Ruthenians	3 x
Frenchmen	6 (3 4 x)
Dutchmen	2 x
Greeks	2 x
Prisoner-of-war	1 x

a) performances at the camp

12

b) performances at the recreation house

12

total

24

3. Movie shows.

Germans	9
Italians	13 (12 1 x)
Spaniards	7 x
Slovaks	7 (3 5 x)
Flemings	7 (3 5 x)
Bulgarians	7 x
Greeks	10 (3 8 x)
White Ruthenians	9 x
Frenchmen	19
Dutchmen	1 x
Greeks	9 x
Belgians	15 (3 13 x)
Poles	10 x
Eastern workers	12

Separate performances

according to nationality: 60

Mixed performances

26

Total

86

4. Short events (by performers from the camp)

a) Boxing, Wrestling, Catch, Jiu-Jitsu.

Frenchmen	9
Prisoners-of-war	2

a) Boxing etc. 11

b) Soccer Games

Frenchmen	22
Dutchmen	8
Greeks	9

b) Soccer 39

Total

50

(Page 3 of original)

5. Tournaments (Bridge, Chess, Checkers, Belotte):

Frenchmen	4 (3+ 1 x)		
Dutchmen	1 x	Total	4

6. Steamer trips

a) to Ruedesheim

16 May 1943 Frenchmen and Flamands
20 June 1943 Conscripted German women and girls on
auxiliary war service

a) Ruedesheim	2	
b) Neckarsteinach	3	
Total		5

b) Neckarsteinach

18 July 1943 Frenchmen, Italians, Slovaks
8 August 1943 Germans
22 August 1943 Germans

7. Other trips

11 April 1943	Croats to Frankfurt (for Croat National Holiday)	
11 April 1943	Dutchmen to Saarbruecken (for Holland Day)	Total 4
4 July 1943	Frenchmen to Bad Duerckheim (course participants)	
21 July 1943	Spaniards to Saarbruecken (for Spanish National Holiday)	

Summary:

1) Performances by camp entertainers	167
2) Performances by outside "Strength through Joy" performers	24
3) Movie shows	86
4) Sport events	50
5) Game tournaments	4
6) Steamer trips	5
7) Other trips	4
Total events	340

x - Mixed performances attended by people of various nationalities at the same time.

(Page 4 of original)

Existing recreational groups

Orchestras:

International Camp Orchestra	18 men
French Musette Orchestra	7 "
French Orchestra of Camp VI	6 "
Modern French Trio	3 "
Dutch Orchestra	16 "
2 Orchestras of Eastern Workers (33+5)	38 "
	<hr/> 78 men

Dramatic Groups:

- 4 French (2 in Communal Camp II)
(2 in " " VI)
- 1 Dutch
- 1 Croatian
- 1 Eastern Workers

Choirs:

- 2 French
- 1 Dutch
- 1 Eastern Workers
- 1 French Comic Singing Group

Singing Groups:

- 2 French
- 1 Italian
- 1 Croatian
- 1 Dutch-Flémish
- 1 Eastern Workers

Comedian Groups:

- 2 French
- 1 Dutch
- 1 Italian
- 1 Croatian

Dancing Groups:

- 1 Burlesque ballet
- 1 White Russian dancing-couple
- 1 Croat Group
- 1 Group of Eastern Workers
- 1 Eastern Workers dancing-couple

Solcists:

- 3 pianists (1 French, 1 Eastern Worker)
- 2 Violinists (1 " , 1 ")
- 4 Guitar Players (1 " , 3 ")
- 1 Clarinet Player
- 1 Flutist
- 1 Saxophonist
- 1 Trumpet Player
- 5 Accordion Players (3 Frenchmen,
1 Flamand, 1 Eastern Worker)
- 5 Reciters (3 French and 2 Eastern Worker)
- 2 Acrobat (French)
- 3 Hariclane (1 Dutch, 1 Eastern Worker,
1 Italian)
- 1 Impersonator (French)
- 2 Chansonniers "
- 3 Composers (2 French, 1 Eastern Worker)
- 2 Authors (French Plays, Lieder, Po.)
- 1 Organist (French)

In addition the necessary directors, stage secretaries, stage decorators,
 stage managers, painters, electricians and stage assistants.

(Page 5 of the original)

8. Language Courses.

The following courses were held:

28 language courses for foreigners,

1 course for Eastern workers has been held for several months.

9. Newspaper.

The following papers were received:

Dailies:

Weeklies:

Fortnightly newspapers:

Approximate number of newspapers receiving during 1943: 1 187 000

10. Libraries.

We have the following libraries in the camp:

1 German (only for camp inhabitants)

1 Slovak

1 Croatian

1 Flemish

1 Dutch

3 French

1 for Eastern Workers

Furthermore, the camp management set up the following:

1 Handicraft workshop for Eastern Workers

4 Recreation rooms for Eastern Workers, under construction.

Copy

I.G. Ludwigshafen
Cultural Camp Welfare

4 May 1944

To all Club Leaders (Kameradschaftsfuehrer)

The management for recreational activities has organized a request concert for 27 May 1944, at the recreation house. You will receive the necessary instructions at a later date, through your camp leader. However, we wish to give you more detailed information concerning a few specific points. Above all, you are requested to canvass your countrymen for the event in order to ensure the financial success of the evening which has been arranged for the benefit of air-raid victims and bombed-out persons in France. You will be issued a subscription list in which you will enter the number of tickets required together with the money which you will receive from every room under your supervision. The person in charge of the room will sign the list and you will hand him a receipt, the number of which must agree with the current number on the list. Deadline for the handing in of the lists and money is Saturday 13 May 1944 when they will have to be presented at the office of your camp management. From there, they will be sent to the office for recreational activities (Frl. REICHEL) on Monday 15 May 1944.

Excerpt

from the newspaper, "Le Pont", Plauen, 9 July 1944

Weekly Paper on French Life in Germany

General Sport Festival at Ludwigshafen

400 French contestants

I must admit that when we had received a telegram at the "Pont" inviting us to a sport festival at which 400 French athletes were participating, I thought it was just a joke.

Just imagine! at a time when transfers are more and more difficult, when the work days have been lengthened, when the air-raid alarms are frequent that the French of Ludwigshafen should have succeeded in bringing 400 of our compatriots together on a sport-field....

and not as spectators but as active participants!

Improbable! Unbelievable!

At any rate the telegram bore all the signs of being an official invitation.

At the scene, my astonishment was to become even greater. Not only were the 400 athletes really and truly there! but also about 50 German, Czech, and Polish athletes had been invited to participate in the athletic contests and the soccer and basket-ball tournaments.

But before giving you a brief account of the day's events, I should like to present the authors of its success.

.....

The team belonging to Camp II is the model team. It has a special hut. From the outside, in every respect ^{it} resembles the huts with which you are acquainted

(page 2 of original)

and of which there are thousands all through the Reich. But if you go inside, you cannot help but be surprised. Each room is reserved for one section: there are theater artists, musicians, singers, poster and decoration artists, electricians, and stage hands, soccer-players etc..... And each team has vied with the others to give its room an appearance all its own.

.....

But Camp VI is the French camp and it also has its theatrical troupe, its sport sections, its orchestra, its youth group

Each hut has been given the name of a French province, and wherever possible, people coming from that region were brought together there; each room has the name of a city and each "city" ardently competes with the others for the decoration of its "zimmer".

Naturally a great deal of sports propaganda is carried on among the young people, and M. GRAMPA told us that according to estimates, one out of every 3 is actively engaged in sports.

Furthermore, we have been attracted to Ludwigshafen today by a great sports festival, - have we not? And the success of this meeting entitles us to expatiate on the sports organization of the I.G. Farben camp.

(page 3 of original)

This fact deserves to be emphasized! The most active section is that of a physical training. Every Wednesday and Friday, amateur athletes and volley-ball and basket-ball players gather together under the direction of MM MOREAU and WEETS. Each one can train in his own favorite sport after the physical culture lesson.

Tuesday is the day for boxing. Thursday is the day for soccer. In addition, the question of opening up a swimming program soon on Mondays and Thursdays is now under discussion; there are already more than 50 who have signed up as wishing to learn to swim.

Finally it must be emphasized that "announcements" showing the measurements and the main performances are published periodically. Those skilled in physical training actually undergo a brief medical examination about once a month.

The festival to which we had been invited was the culmination of all these efforts in behalf of sports. During the morning, the semi-finals revealed the best elements involved. But it was only at two o'clock that the actual festival itself can be said to have begun.

.....

The firm took great pains to reward the athletes who distinguished themselves in the different contests. Special medals had even been struck and were awarded to the members of the final teams in soccer and basket-ball as well as to the three winners in each of the athletic finals.

(page 4 of original)

In addition, several hundred cigarettes, card games, pipes,
pictures ... were distributed on a fair basis.

Furthermore, a hot meal was served to all the participants at
noon-time.

Copy-

5A 056/Pr-N

61 409 Roger BLANC
22/4/6 Re. Workers
Braunoxyl-Fabrik
Nancy GL V
87 Av. de Strasbourg
29 January 1924 - 26 May 1943

Place of birth: Nancy/L.D.M.

Trade

Painter

Place of work

Date	Department	Plant	Account No.
12 Dec 1944	Transportation Operations	Transportation	64 882
26 Jan 1945	Dismissed	Supervisory Office K.A.Lu./Doerrenbach	-

Wage rate		Supplementary payments		handwritten:
		(Official note: Reasons)		
Daily	Pfg.	Daily	Pfg.	
29 Jan 44	61	12 Dec 44	5	Special risk bonus
12 Dec 44	68		1,5	Trade bonus

Correspondence

Date	Subject	Fines			No.
3 July 44	From legal division concerning shirking	date	amount	Offense	
		13 July 43	1 day's pay	attempted escape	3461
		21 Aug 43	4 hours	unexcused absence	4258
		11 Nov 43	1 day's pay	"	4784

Document Book IV WURSTER
 Document No. 17 572
 Ech. No.

IG Ludwigshafen
 Personnel Department

55 189/Pr-N

60 815 André SIES
 Unskilled worker
 Butandiol-Distillation
 Nancy/M 1 L GL V
 97 rue St. Nicolas
 00 22 July 23/11 June 43

Place of birth Bonseieres aux Chenes Kr. M. & L.

Work place

Date	Dept.	Reference	Account No.
22 Febr 45	Dismissed	absent without excuse	on 23 Jan 43
Rate of pay		Bonus	Reason
Date	Pfg.	Date Pfg.	
22 July 1943	54.5 61	22 July 1943 3	Trade bonus
22 July 68 1944			

Correspondence:

Fines:

Date	Reference...	No.	Date	Amount	Reason	No.
12 July 44	Refusal to re- lease for servi- ce with Waffen SS	9583	13 July 43	1 day's pay	attempted escape	3461

Copy:

- Dept. Account No. 60 815

To

The Replacement Bureau of the Waffen SS

Replacement Office Rhein (XII)

(16) V i e s b a d e n .

Bahnhofstrasse 46.

Arb. Kos./Str. 12. July 1944

We regret to inform you that, owing to the excessive shortage of suitable labor, we are unable to release

André SIES, born 22 July 1923

residing: Communal Camp VI of the IG Farbenindustrie A.G.
Ludwigshafen on the Rhine,

a French worker employed by us. Enclosed we are returning to you your request to the above mentioned person to present himself for a medical examination together with the railroad ticket, issued to him.

Heil Hitler:

I.G. FARBEINDUSTRIE ANTIENGESELLSCHAFT
Personnel Department

Signed: HOFFMANN

2 enclosures

Note:

Agreement by telephone - SIES will not be released by the firm.

Dr. MOELLER

Lu. 158

Copy.

Affidavit.

I, the undersigned Dr. Hans MOELLER, born on 9 January 1907 at Hemmen, residing at Hemmen in the district of Lauterbach/Hessen, having been cautioned that I am liable to punishment if I make a false affidavit, herewith depose and declare that my statement is true and has been made in order to be submitted as evidence in Case VI before the Military Tribunal at the Palace of Justice, Nurnberg, Germany.

During the Second World War, I worked as chemist for the I.G. works Ludwigshafen/Rh.-Oppau. Among my subordinates, there was also the Frenchman Andre SIES. I recollect, that one day Mr. SIES, who was a man of very unsettled temperament, volunteered for service with the Waffen SS. In order to deter him from a hasty step, I told him that he could not be spared by the firm, whereupon the personnel department, on 12 July 1944, informed the Waffen SS by letter that Mr. SIES could not be released. Mr. SIES remained at the works until the end of 1944 when he disappeared. We have never been able to learn anything about his whereabouts. As far as I know, Mr. SIES was never assigned to a corrective training department.

Ludwigshafen on the Rhine, 22 March 1948

Signed: Dr. Hans MOELLER

I, Dr. Wolfgang HEINTZELER, Ludwigshafen on the Rhine, Bruckstrasse 13, witness and certify the above signature of Dr. Hans MOELLER.

Ludwigshafen on the Rhine, 22 March 1948

Signed: Dr. Wolfgang HEINTZELER

Attorney

Copy.

Excerpt

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT LUDWIGSHAFEN A.RH.

30 March 1944/v..

File note concerning the conference on 30 March 1944 at the
Employment Office at Ludwigshafen on the Rhine.

Subject: Procedure for labor release and employment.

Present: Johann SCHMITT with 5 experts (Employment Office),

Oberingenieur HOFFMANN with 2 experts (I.G.)

1. Released.

.....

2. Employment.

.....

3. Applications for termination of employment.

The Ludwigshafen Employment Office asks that unsatisfactory work should not be mentioned as reason for the application for termination of employment, since no person will be released for that reason. According to directives from the work assignment offices such workers are to be dealt with by corrective training or punitive measures but they are not to be given the opportunity to leave their jobs.

4. Fetching of newly arrived workers.

.....

5. Questionnaires for the employment book for foreigners.

.....

Signed: HOFFMANN

Copy
to Director Dr. WEISS
" Herr ECKERT
" " LEDERLE
" " BISCHOFF

Document Book IV VURSTEN
Document No. W 569
Exh. No

I herewith certify that the above excerpt from the file
note dated 30 March 1944 is a true and correct copy.

Ludwigshafen on the Rhine, 16 March 1948.

Signed: Dr. Wolfgang HEINTZLER
Attorney.

Copy.

Affidavit.

I, Karl WURSTER, born on 6 April 1892 in Rothenburg ob der Tauber, at present residing in Ludwigshafen, Ritterstrasse 22, having been duly cautioned that I am liable to punishment if I make a false affidavit, herewith depose and swear that my statement is true and has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice at Nurnberg, Germany.

1. Since 1926, I have been working for the I.G. Farbenindustrie A.G. works at Ludwigshafen on the Rhine. During the war I was a member of the plant security police.
2. When, in 1943, by official order the works had to release a parcel of land of the works site for the erection of a corrective training camp, I was, for some weeks, assigned to the guard of this camp. Thus, I know this corrective training camp from my own experience.
3. The so-called corrective labor training camp consisted of a single shed, namely a double-sized workmen's hut, as used by the Reich Labor Service. This hut could house about 40 - 50 men. While I was there, the hut was, however, only occupied by a maximum of 18 - 20 men. The internal equipment of the hut consisted of wooden bedsteads with pallets and woolen blankets, stools and tables, every room had a stove and electric light.

The hut had a barbed wire fence, some distance away from the building so that the inmates had considerable freedom of movement.

4. Confinement in the corrective labor training camp was ordered by the State Police. In every case, the State Police stated the term of confinement in the corresponding order. I cannot remember a single case when a person was held there for more than 4 to 6 weeks; after this period he returned to his old job. In every case, the State Police sent us only workers who had committed grave violations of discipline, such as people who engaged mainly in black-market activities absenting themselves for long periods from their normal place of work, just loafing about.

Altogether, the guard consisted of three elderly men, they were mostly over 60 years of age and all of them were good-natured people. Any ill-treatment is completely out of the question.

5. Every day, the food of the prisoners was fetched from one of the plant kitchens in the camp. The prisoners' rations, which were fixed by the State, were the same as those of the Eastern workers.

The health of the prisoners did not deteriorate during their stay at the so-called corrective labor training camp. It is absurd to speak of inmates who came to look like skeletons.

6. In the beginning the camp inmates were engaged in the building of airraid tunnels which were to be used by the inmates themselves. Subsequently, the inmates were used for work outside the camp, namely

mainly for the work of loading and unloading as otherwise carried out by other workers. The daily working hours were exactly the same as those of free German and foreign workers.

7. It is absurd to say that the inmates had shaven heads, they all had perfectly normal hair styles but perhaps there was one among them who had his hair shaven before he was admitted. Altogether, the inmates were treated in a normal and decent manner, the only disadvantage they had to put up with, during this police confinement, was that they were deprived of their freedom for a short time and that they worked under guard.
8. After several weeks, I was transferred elsewhere to a different assignment and from that date on my direct communication with the camp ceased. However, during the whole of the war, I returned to Ludwigshafen, time and again and on several occasions I took an interest in the camp. Thus, I can confirm that the camp was never extended beyond that one hut. There were also no other important changes, otherwise I would most certainly have heard of it.
9. My successor at the camp was a certain Herr HOCHREITHNER. I know, that soon after the collapse, this man was at first arrested by French Military Government but he was later acquitted by the Military Tribunal at Baden-Baden.
I, personally, was not asked by the French Military Government to render an account of myself. Furthermore, as proof of the fact

Document Book IV WURSTER
Document No. W 224
Exh.

that there were no irregularities at the camp, I should like to mention that, some time ago, while bathing at Willersin-Weiher, I met two Frenchmen, who were confined at the camp while I was there; they approached me, talked with me in a friendly fashion and showed no resentment with regard to their stay at the corrective labor training camp.

Ludwigshafen on the Rhine, 30 January 1948

Signed: Karl WEBER

I, Dr. Wolfgang HEINTZELER, Ludwigshafen on the Rhine, Bruckstrasse 13, herewith witness and certify the above signature of Herr Karl WEBER of Ludwigshafen on the Rhine, 30 January 1948.

Signed: Dr. Wolfgang HEINTZELER

Attorney

Copy.

Affidavit.

I, the undersigned, Dr. Jur. Paul BAUER, Attorney, residing at Baden-Baden, Gernsbacherstrasse 32, having been duly cautioned that I am liable to punishment if I make a false affidavit, herewith declare and depose that my statement is true and has been made in order to be submitted as evidence for Case VI, before the Military Tribunal at the Palace of Justice at "uerenberg, Germany.

1. I am an independent attorney with an office in Baden-Baden.
2. In 1947, I acted before the ordinary Military Court at Baden-Baden as counsel for the defense for three men who, during the war, had been engaged in the supervision of foreign workers at the Ludwigshafen-Oppeu works. The men in question were
 - a) Julius KLETT, master-workmen, of Heidelberg-Wieblingen, Tulpenweg 11.
 - b) Gregor HOCHREITHER, transportation supervisor, of Ludwigshafen on the Rhine, Sodestrasse 39 b.
 - c) Emil BRITZCHER, of Speyer on the Rhine, Bahnhofstrasse 103.

The three men had been charged with a crime against humanity because of incorrect behavior towards foreign workers at the Ludwigshafen-Oppeu works. I herewith confirm that the three men were acquitted of this charge.

Document Book IV 'AURSTER
Document No. W/263
Exh. No.

3. I know of no other proceedings before a military tribunal on charges of incorrect conduct towards foreign workers at the Ludwigshafen-Oppau works.

Baden-Baden, 2 February 1948

Signed: Dr. Paul BAUER

I, Dr. Wolfgang HEINTZLER, Ludwigshafen on the Rhine, Brunn-
strasse 13, herewith certify the above signature of Dr. jur.
Paul BAUER, of Baden-Baden, Gernsbacherstrasse 32.

Ludwigshafen on the Rhine,
5 February 1948

Signed: Dr. Wolfgang HEINTZLER
Attorney.

Copy

Neustadt, 19 December 1947
Marktplatz 8

No. 1230/1947/Dr. Sa.

Trade Inspection Board

for the "salinate"

TO: The Badische Anilin- & Soda-Fabrik
Ludwigshafen
Attention: Dipl. Ing. STEINHART, Security Engineer,
Security Building Lu 510

Ludwigshafen on the Rhine .

Subject: Labor Protection for Foreign Workers during the war.

In my capacity as head of the appropriate Trade Inspection Board during the war, I herewith send you, upon request, the following information, concerning labor protection for foreign workers in the Ludwigshafen and Oppau plants:

With respect to accident and health protection, no difference was made between German and foreign workers.

Of the numerous directives on the subject, issued by the Reich Minister of Labor, I herewith call special attention to the following:

" The regulations applicable to the German personnel, concerning protection against accidents and occupational diseases, including the regulations concerning prohibited work and dangerous work, are to be applied " (to the foreign workers and the workers from the East.)

Special regulations or exceptions to the above were never-decreed nor were they in any instance requested by the firm. Generally speaking, the above quoted regulations

(Page 2 of original)

by the Reich Minister for Labor were in practice carried out. Foreign workers were not used in preference to Germans for work with a high accidents rate or for work injurious to health, and this is clearly borne out by accident statistics.

Apparatuses the servicing of which is frequently accompanied by accidents or is injurious to health, were for the most part manned by German workers.

Severe and fatal accidents were investigated at once, regardless of nationality, and in all cases suitable counter measures were ordered for the most part almost immediately, so that an official order was no longer necessary. The most important accident prevention regulations were hung up at the places of work in an exact translation of the German text, especially also instruction and danger signs.

In the weekly meetings held by official and plant security engineers, necessary food rations were determined according to the individual jobs, that is, the authorization was granted regardless of nationality.

The distribution of the supplementary rations was also supervised regularly, and the kitchens, bathing and sleeping huts and medical service (dispensary hut) were exemplary and were frequently inspected.

(Page 3 of original)

The Camp Ordinance dated 14 July 1943, Reich Law Gazette Page 386, was applied, over and above its intended scope, even to prisoners of war as well.

Working hours for the foreign workers corresponded to the arrangement of shifts for the German employees.

The Board of Directors, the Personnel Department and the Security Engineers carried out necessary measures for the protection of life and health in a correct and generous manner, traditional for BASF.

I shall be glad to give you more detailed information, if necessary, to send you documents, and to confirm the truth of the above statements by oath.

As Deputy:

signature: Dr. WESSECKE

(Government Councillor
and Factory Officer.)

(Regierungs- und Gewerberat)

Seal:

Trade Inspection Bureau

Ludwigshafen on the Rhine

Copy

Affidavit

I the below-signed, Dipl. Inc. (Graduate Engineer) Franz STEINHART, born on 11 November 1901, resident of Ludwigshafen on the Rhine, Haardtstrasse 24, have been warned that I am liable to punishment, if I make a false affidavit. I herewith affirm that my statement is true and was made in order to be submitted as evidence before the Military Tribunal for Case 6 at the Palace of Justice in Nuremberg/Germany.

1. I have been employed at the I.G. Plant at Ludwigshafen-Cypern since July 1929, and since 1938, to the present day, my chief occupation has been that of Security Engineer for the Ludwigshafen plant.

The Security Engineer is the deputy of the Plant Administration, for the control of all security installations and security measures in the plant, for the prevention of accidents as well as the investigation of accidents, and for the administrative settlement of all matters relating to accidents.

Among other things, it is the duty of the Security Engineer to maintain communications with the appropriate agency for accident insurance covered by Reich law; for the Ludwigshafen-Cypern plant, this is the "Berufsgenossenschaft der Chemischen Industrie, Section VI in Mannheim (Trade Association for the Chemical Industry, Section VI in Mannheim).

2. "Die Berufsgenossenschaft der Chemischen Industrie" has for decades published very voluminous accident prevention regulations for chemical factories.

(Page 2 of original)

The volume of these regulations is so great that it is actually impossible practically speaking, for the ordinary worker to absorb their content. In 1940, therefore, in my capacity of Security Engineer, I drew up a readily understandable extract of the official accident prevention regulations, for the German workers. This extract was such that the individual worker could understand everything that he had to know for his own personal protection against accidents in the factory. These instructions were issued in the form of a small pamphlet with about 30 to 40 pages at the plant printing shop, and distributed to all the German workers of the plant. During the war, when it became necessary to employ more and more foreign workers at the Ludwigschafen-Oppel plant, Dr. WUESTER as Plant Leader ordered the "Anleitung zur Verhütung von Unfällen" (Instructions for the Prevention of Accidents), which I had drawn up for the German workers, to be translated into other languages as well, for the use of the foreign workers. This was done, and I remember that the "Instructions" were translated into French, Italian, and Polish, in an unabridged form; the "Instructions" as issued in foreign languages, corresponded exactly to the German version; they were put out by the plant printing shop in the same form as the German "Instructions" and were distributed to all the foreign workers of the nationalities concerned.

3. In other respects as well everything was done, upon the orders of Dr. WUESTER, to issue instructions to the foreign workers for the

(Page 3 of original)

prevention of accidents. Warning signs etc. were displayed everywhere in the factory in various languages; sometimes, we even put up warning signs for illiterates, in the form of illustrations. In general I can state that Dr. USSEK as plant leader was as much concerned with the welfare of the foreigners working at the plant, as he was with that of the German workers.

Ludwigshafen on the Rhine, 30 January 1968

signature: Dipl. Ing. Franz SCHIMMERT

I, Dr. Wolfgang REINHARDT, Ludwigshafen on the Rhine, Grunhofstrasse 15, herewith witness and certify the above signature of Dipl. Ing. Franz SCHIMMERT.

Ludwigshafen on the Rhine, 30 January 1968

signature: Dr. Wolfgang REINHARDT

Attorney

Contract

Instructions to all workers
for the Prevention of
Injury to Health and of Accidents
General Regulations
September 1940

I.G. FARBENINDUSTRIE AGTIEGENSCHAFT
PLANTS AT LUDWIGSHAFEN ON THE RHINE AND AT OPPAU

Contents

	Page
Man in the Factory	
1. Hygiene	9
2. Conduct in the Plant	11
3. Contacts inside and outside the factory	13
Plant Installations and Devices.	
1. Transmissions	16
2. Production machines	16
3. Cranes and elevators	17
4. Pressure tanks and pipes	19
5. Electric installations	21
6. Liquefied and compressed gases	22
7. Ladders and stairs	24
Protection against special dangers.	
1. Work clothes	25
2. Eye protective	25
3. Breathing protective	27

(Page 2 of original)

4. Protection against fire and explosion	28
5. Protection against caustics and against poisoning . . .	31
6. Protection against transportation dangers	32
7. Safeguarding persons and objects against falling . . .	33

Combat Danger !

That is the slogan of the workmen! Every occupation entails its own special dangers. If you are familiar with them, you can protect yourself against them.

The pages of this pamphlet contain an extract from official regulations and from those of trade associations from regulations for the prevention of disease, and from notices, - regulations which should be known to everyone who, by work of his hands contributes to the good of society.

These regulations should not be considered as laws for the violation of which punishment will be exacted! They are rules and recommendations based on many years of experience, for the sole benefit of the highest possession of the working-men:

Health and Energy!

It is in this spirit that they should be read and, above all, followed!

.....

.....

The Plant Management

(Page 3 of original)

I herewith affirm that the foregoing is an accurate excerpt from the "Instructions to all Workers for the Prevention of Injury to Health and of Accidents" issued by the I.G. Farbenindustrie Aktiengesellschaft, Plants at Ludwigshafen on the Rhine and Cypau, in September 1940.

Ludwigshafen on the Rhine, 15 March 1946

Signature: Dr. Wolfgang HEINTZELER

Attorney

A limited number of photostatic copies of the complete instructions in German, French, Slovakian, and Italian, is being submitted separately. (WURSTER Documents 13A, 13B, 13C, and 13D)

(Page 4 of original)

Danger of Explosion!
Smoking, Open Light and Fire Prohibited
Avoid Sparks

Text	Italian	Text	Spanish
Text	Slovakian	Text	Croatian
Text	French	Text	Dutch
Text	Polish	Text	Russian
	Picture	Picture	Picture

Copy

Affidavit

I, Margarete MOLL, resident of Mannheim, Charlottenstrasse 9, have been duly warned that I am liable to punishment, if I make a false affidavit. I herewith affirm that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nuremberg, Germany.

In 1942, the Board of Directors of the I.G. Plant in Ludwigshafen approached me with the request that I go to Italy to visit the families of deceased plant employees of Italian nationality, in order to inform them what pension they were now to receive. This was necessary, because up till that time, all efforts to undertake payment of the pensions to the survivors of these workers had been only partly successful; and practically speaking, it was impossible to arrange for regular payments of the pensions.

I can still remember very clearly that both the Italian authorities with whom I had to negotiate as well as the families which I myself visited, were quite astonished at the generous welfare that I.G. Ludwigshafen allotted to the survivors of the deceased workers. This was acknowledged and admired by the Italian authorities; the families themselves felt quite honored and were very thankful.

(Page 2 of original)

Conditions among these families were sometimes very wretched. The relatively large pensions which were allotted, beyond question enabled the families not only to have better quarters and to live better, but also to give the children good occupational training.

I remember a case in which a girl in one of these families gave the impression of being particularly bright and intelligent. When I asked her what she wanted to be, she replied that she wanted to be a teacher. I then suggested to the Board of Directors of the I.G. Ludwigshafen that, if at all possible, it grant the family a training subsidy for this daughter. Later I learned that the Board of Directors actually granted a special plant supplement in this case.

As a result of my efforts to reach an agreement with the Italian authorities, we were successful in making arrangements for regular payment of the pensions.

Ludwigshafen on the Rhine, 25 January 1948

signature: Margarete KOLL

I, Dr. Wolfgang HEINTZLER, Ludwigshafen, Bruckstrasse 13, herewith witness and certify the above signature of Margarete KOLL, resident of Mannheim, Charlottenstrasse 9.

Ludwigshafen on the Rhine, 25 January 1948

signature: Dr. Wolfgang HEINTZLER
Attorney

Copy

Affidavit

I, the below - signed, Otto ECKERT, born on 27 December 1889 in Germersheim in the Palatinate, resident of Heidelberg, Kaiserstrasse 41, have been duly warned that I am liable to punishment, if I make a false affidavit. I herewith affirm that my statement is true and was made in order to be submitted as evidence before the Military Tribunal for Case 6, in the Palace of Justice in Nuremberg, Germany.

1. I have been in the employ of the Badische Anilin- & Soda-Fabrik, Ludwigshafen on the Rhine, since 1 July 1911. From 1919 on, I was expert for worker's affairs, and since 1939, I have been head of the Personnel Department for Workers in the Badische Anilin- & Soda-Fabrik. As a result of my work during the war, I am also completely informed about the labor assignment of foreign workers and the prisoners of war allocated to the plant.

"At the suggestion of the District Labor Exchange the use of the male and female Eastern workers in our plants had been investigated as we had been threatened with their withdrawal and exchange for women from Lorraine if they were not employed in accordance with the regulations. The investigations had shown that 85% were employed on heavy and very heavy manual labor and as alternate shift workers, the remainder being engaged either on special tasks on account of special qualifications or on particularly unpleasant work in plants involving the use

(page 2 of original)

of acids and other dirty processes. Their release was therefore out of the question.

I have been shown the above passage from the minutes of the Ludwigshafen Board of Directors Conference held on 19 April 1943. (Document NI 6315, Exhibit 1339). On the basis of my official information, I can give the following explanation:

3. Dr. WURSTER always made special efforts with regard to food, for the German and foreign workers employed at the plant. It was upon his order that during the entire war, we pursued the policy of classifying as high a percentage as possible of workers etc., employed in the plant, - both German as well as foreign workers and prisoners of war, - as heavy and very heavy workers, in order to obtain the corresponding supplementary food rations for these categories. In particular, we followed this policy with respect to Eastern workers and prisoners of war, because their officially established regular rations were somewhat lower than those for other normal consumers. Similarly the workers on alternating shifts (that is, workers who, in plants on non-stop production work for 12 hours and then have a 24 hour break)

(page 3 of original)

- received a supplementary food ration for shift workers, regardless of their nationality, unless they had already received a supplementary ration as heavy or very heavy workers or as workers employed for excessively long hours.
4. The expression used in the minutes of 19 April 1943 "particularly disagreeable work in plants involving the use of acids or messy processes", is generally used in the chemical industry to characterize work for which "extra pay for disagreeable work" (Lastigkeitszuschlag) is given to the employee who carries it out. (The expression is based on the Reich Ordinance for Wage Scales for Workers in the Chemical Industry, dated 1 October 1939, Article 4, Number 5a). During the war there was a so-called price freeze, - that is, there was a ban on paying wages higher than those authorized by the State. In order to counteract the effects of the price freeze, during the war, therefore, we pursued the policy of designating as many plants as possible as having "particularly disagreeable work involving the use of acids and messy processes", so that we could have the corresponding extra pay given to as many employees as possible. This applied especially to the Eastern workers, who, as a result of the so-called Deduction for Eastern workers provided for by the state, received lower pay than the other workers.
5. During the weeks prior to the Board of Directors Meeting of 19 April 1943, the Regional Labor Office - as is shown from the contents of the minutes - had investigated the male and female Eastern workers in our employ, and had then

(page 4 of original)

objected that the work done by these Eastern workers was not in keeping with regulations, that is, that the manpower from the East was not being exploited to the full in our factory. We were threatened with having 300 female Eastern workers withdrawn from our plant and sent to Lorraine for heavy industry and with having a similar number of women allotted to us from Lorraine. We resisted this plan of the Land Regional Labor Office on the one hand, because we wished to save the female Eastern workers in our employ from the fate of being assigned to heavy industry in Lorraine, and on the other hand, because we did not wish to take on women from Lorraine in exchange for the female Eastern workers whom we had trained and who were very well broken in at our plant. In order to be able to prove to the Regional Labor Office that Eastern workers in our plant, contrary to the opinion of the Regional Labor Office, were being employed in keeping with regulations", we pointed to the fact that 85% of our Eastern workers were employed as heavy and very heavy workers and as workers on alternating shifts. The motive for this is obvious from my statements under Number 3. The remaining 15% of the Eastern workers, we claimed, were to be considered as being employed either as specialists or at "particularly disagreeable work in plants involving the use of acids and messy processes". The motive for this is apparent from my statements under Number 4. We were thus able to make it clear to the Regional Labor Office that, - as stated at the end of the quoted passage from the minutes of 19 April 1943 - "a release of the Eastern workers was out of the question".

(page 5 of original)

5. The explanation for the fact that this entire picture was not expressly and specifically presented in the minutes of 19 April 1943, that during the Third Reich one could not be careful enough in committing such matters to writing. It was immediately clear, however, to every responsible employee of the plant who saw the minutes of 19 April 1943, that they were nothing more than a protective measure for the Eastern workers employed by us.

Ludwigshafen on the Rhine, 29 January 1948

signature: Otto ECKERT

I, Dr. Wolfgang HEINTZLER, Ludwigshafen on the Rhine, Bruckstrasse 13, herewith certify and attest the foregoing signature of Herr Otto ECKERT.

Ludwigshafen on the Rhine, 29 January 1948

signature: Dr. Wolfgang HEINTZLER

I.G. FARBEINDUSTRIE AKTIENGESELLSCHAFT
Personnel Department

Ludwigshafen on the Rhine, 13 April 1943/No.

To the Departments

Very urgent!

Subject: Assignment of Eastern Workers

The Labor Office at Ludwigshafen on the Rhine has informed us that in the near future, a group of female and male Eastern workers is to be transferred to Lorraine as quickly as possible. The Regional Labor Office requests that in return for the German women allocated to the industry during March, a rather large number of male and female Eastern workers be released. According to provisional estimates, we are thus compelled to release about 300 workers. The transfer itself is to be carried out in April. To our representations that the German women are not yet thoroughly trained at their place of work, and that up till now only an insufficient number of women had been allocated for alternating shifts, the answer was given that similar conditions existed more or less in industry as a whole, and generally speaking could not be taken into consideration. All that was left for us to do was to try to prove that all our male and female Eastern workers were assigned to heavy work or to alternating shifts (Wechselschicht) and could therefore not be exchanged for German women. We would have to be responsible for any such proof.

(page 2 of original)

There was every prospect of our having to release female Eastern workers who were not employed in the above-mentioned manner.

Thus, in order to retain as many as possible of our workers, we request that you inform the Personnel Department/Labor Allocation as quickly as possible, but by 15 April 1943 at the latest, whether these conditions concerning the assignment of Eastern workers have been met with in your department. For this purpose, you are to tell us how many of the male and female Eastern workers employed in your department are working as:

- a) heavy and very heavy workers,
- b) workers on alternating shifts,
- c) other kinds of workers.

Personnel Department

Information Copy to the
Confidential Agents for Eastern Workers

Copy

I.G. FARBENINDUSTRIE AKTIENGESellschaft, Ludwigshafen on the Rhine.

The members of the Labor Allocation Staff Urgent!

Confidential

Personnel Department 3 June 1943/C.

Inspection of our Distribution of Labor, by a Commission from the Regional Labor Office.

According to the latest information we have received, we must expect that the planned inspection of our distribution of labor will take place during the coming week. Wherever possible, the experts of the individual departments will be given advance notice in due course, and the attempt will be made to bring the entire Labor Allocation Staff to the conference.

The main issue in question is probably the fact that in the opinion of the Labor Office, too many laborers have been allocated to us, under the program for the assignment of German women as compared to other firms. The authorities therefore assume that it would be possible to take a rather large number of female Eastern workers from us and send them to Lorraine. As is known a grave labor shortage still exists in the Lorraine heavy industry plants. This shortage cannot be filled by Germans or by other foreign men, so that only male and female Eastern workers can be considered. The Regional Labor Office will therefore try to prove to us, with every means at its disposal, that our workers (this means workers of all kinds) were not being employed on all jobs, in a manner corresponding to the present grave shortage.

(page 2 of original)

The opinion of the Regional Labor Office has probably been confirmed by statements and reports which it has received concerning inadequate utilization of man-power in our plants.

In this connection, attention is again called to the fact that male and female Eastern workers must be assigned to night shift work or to heavy work, or to work for which German males are not available and which is unsuitable for German women. In addition, it must be shown that the male and female Eastern workers are constantly employed at extremely strenuous work.

We must expect the Commission to carry out numerous spot checks, and that on the basis of past experience, it will not inspect the distribution of Eastern workers alone, but also the work of our male and female employees in general. We therefore wish to request you to keep all papers for your department in readiness, so that, if necessary, the desired information can be given to the Commission. Furthermore, we request that the workers be employed in keeping with requirements, because otherwise,

We must definitely be prepared to lose a considerable number of workers. Such a procedure would hurt us all the more gravely, since it has been hardly possible recently to obtain any number of replacements worth mentioning.

signature HOFFMANN

To Frä. NEIDLEGER, Herr GUENTHER, Herr SCHLAGE, for their information.

Copy

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT, LUWIGSHAFEN ON THE RHINE.

To:
Headquarters, Mannheim Arsenal District,
Mannheim,
Karl Ludwigstrasse 7

L/90

File reference: 2f10 No. 5995/42-o-Ibl. 30 March 1942
2 April 1942, M.

Subject: Circular letter No. 49, Assignment of Soviet Russians.

Since 29 March 1942, we have employed 112 Soviet Russian civilian workers (Eastern workers), specialists, for the most part. We can not as yet discuss our experience with this assignment, but in view of the organization of our plants, it is relatively difficult. We can not take on any additional Eastern workers for the present, because all available quarters have been reserved for workers already scheduled to arrive.

Wages in their present form are not in keeping with the requirements of the plants, because the Eastern worker loses almost his entire earning in taxes. If we wish to enable him to work productively, we must give him the opportunity to obtain suitable increased wages, which he will be allowed to keep.

Hall Rother:

I.G. FARBENINDUSTRIE AKTIENGESELLSCHAFT

signature: WEISS signature by proxy: HOFFMANN

D. To Herr KUHLMANN (with previous files)

By messenger.

Copy.

Excerpt from the Minutes of the Board of Directors Conference
in Ludwigshafen on the Rhine, on 21 October 1942.

.....

Since the assignment of Eastern workers deserves special attention,
the plant management has commissioned Herr SCHUEFER, of the
Purchasing Department, who speaks Russian fluently, to under-
take exhaustive investigations of this assignment. The results
of this investigation are presented here. Within the plant,
special attention should be given to the correct assignment of
Eastern workers in keeping with their previous knowledge, which
in some instances is good. Special attention should also be given
to a correct and objective evaluation by the plants, of the
work done, and also to changes already carried out in questions
of food and treatment in the camps.

.....

I herewith certify the accuracy of the above excerpt:

Nuremberg, 20 March 1943

Dr. Wolfgang HEINTZELER

Attorney

Copy.

Excerpt from the Minutes of the Board of Directors Conference,
Meeting in Luchelshafen on the Rhine on 13 August 1943.

.....

HOFFMANN submits a report on his experience with the employment
of foreign labor; WURSTER expresses the appreciation of the
Board of Directors to Herr SCHAEFER for his successful work,
upon conclusion of the latter's activity as Special Deputy for
the employment of Eastern workers. It is thanks to his work
primarily that next to our original German personnel, we can today
consider the Eastern workers as being among our best workers.

.....

I herewith certify the accuracy of the above excerpt.

Nuremberg, 20 March 1948.

signature: Dr. Wolfgang HEINTZLER

Attorney

Copy

Affidavit

I, Kurt SCHAEFER, born on 15 January 1892, residing in Kirchheimbolanden, Schlossstrasse 37, have been warned that I render myself liable to punishment if I should make a false statement. I state on oath that my testimony is true and that it was given in order to be submitted in evidence to the Military Tribunal, Palace of Justice, Muenberg, Germany.

1.) In 1941 I started my employment with the I.G. Farbenindustrie Aktiengesellschaft, Ludwigshafen on the Rhine. I first worked in the Purchasing Department as assistant to the department head. After about one year I was made an authorized representative, and then, in November 1943, I became Procurist. Today I hold the position of Head of the Purchasing Department of the Plant Ludwigshafen on the Rhine.

2.) During the first half of 1942, as was customary all over Germany, the plant Ludwigshafen on the Rhine was allocated labor from the occupied territories of the Soviet Union (Eastern workers). The first contingent consisted of about 500 men. In the course of 1942 the plant received further allocations, so that already at the close of 1942 the plant reached its highest employment figure for these allocations with somewhat more than 2,500 Eastern workers.

3.) Since I speak, read, and write Russian, Dr. WURSTER gave me the job of caring for these Eastern workers in August 1942. My first task

(page 2 of original)

consisted of an assignment for about 6 weeks which included listening to the men's wishes on the one hand, and on the other hand in ascertaining the actual living conditions of the Eastern workers and to report on it. On the basis of what I ascertained in these investigations, Dr. WURSTER relieved me from my usual job completely for the time being, and assigned me exclusively to the care of the Eastern workers. In this manner I had for about 9 months daily close contact with the Eastern workers of the plant Ludwigshafen on the Rhine. On the basis of my activities as counselor for the Eastern workers of the plant Ludwigshafen on the Rhine I am in a position to give an exact picture of the conditions under which the Eastern workers of this plant were living.

4.) At the beginning, the camps in which the Eastern workers were housed were under the jurisdiction of the German Labor Front (DAF). Relative to the treatment of Eastern workers, governmental authorities issued extremely strict orders; the guarding of the Eastern workers was checked very strictly by the Gestapo. In almost all phases of their personal life the Eastern workers were subject to special regulations issued by the German government. The result of this situation, created by DAF and Gestapo, was that the Eastern workers, who for the most part had come to Germany voluntarily and gladly, soon began to be openly dissatisfied. Some of the early transports of Eastern workers had left their hometowns with great expectations, and had even been escorted to the station with music; the actual living conditions they found in Germany,

(page 3 of original)

prepared for them by DAF and Gestapo, could only be the cause of disappointment. Dr. WURSTER, as manager of the plant Ludwigshafen on the Rhine, very quickly recognized that it would be necessary to intervene on behalf of the Eastern workers. Because he felt that he had an obligation as a human being to all workers of the plant, Dr. WURSTER personally took charge of the problems of the Eastern workers in two respects:

- a) Taking as a basis my experience as counselor of the Eastern workers and the regular reports I submitted about that subject, Dr. WURSTER applied formally to the competent authorities - including the agencies located in Berlin - in order to effect a general improvement of the regulations relative the treatment of Eastern workers. I remember especially well that Dr. WURSTER, with numerous written applications, fought for considerable reduction of the so-called "Eastern Workers' tax", so that the Eastern workers would receive sufficient net earnings. By this action, Dr. WURSTER personally exposed himself to a considerable extent.
- b) Above all, though, Dr. WURSTER fought with all means at his disposal and contrary to the regulations of DAF and Gestapo for a gradual influence over the living conditions of Eastern workers employed in his plant, so that he would be able - partly contrary to existing government orders - to change them and make them better and more humane.

(page 4 of original)

5.) During the months when I was full-time counselor for Eastern workers, we actually succeeded in gradually reducing the influence of DAF and Gestapo, and in changing the living conditions of the Eastern workers as far as was then possible towards the humane and the decent. That we were successful in this endeavor can be seen, among other things, from the fact that, at the conclusion of hostilities, many Eastern workers only reluctantly left their employment at the plant. I remember especially well that a considerable group of female Eastern workers hid themselves in Building 389 in order to remain at the plant, and I remember also that many of the women shed copious tears when they had to leave their work.

6.) Alone the fact that a full-time counselor was assigned to them, who knew their language, who, to the surprise of the Eastern workers, opened up an office right in their midst, and who cared for their wellbeing from early in the morning until late at night, was something out of the ordinary at that time. When the Eastern workers came home from work at night, I had consultation hours from 17:30 p.m. until 20:00 p.m. and frequently even later than that, and I listened to the troubles and personal wishes of the Eastern workers, concerning material or spiritual things. It was just this personal contact with the Eastern workers that was a contributing factor in helping them not to feel lonely any more in this completely alien environment, where there was nobody to speak their language.

(page 5 of original)

7.) The same was effected by our organizational measures which aimed at granting the Eastern workers, through extensive self-administration, the right to determine their own affairs. We first divided the Eastern workers into small groups of about 12 to 15 men under the leadership of a spokesman (Obmann), and each of these groups was assigned to work en bloc, but formed a small community also in the camp, and was treated as a unit with regard to equipment and other similar problems. The individual groups had the opportunity at any time, through their spokesman, to submit their demands to me, in my capacity as counselor appointed by the management. In the course of time the number of groups increased to about 170, every 12 of which had their special representative. Twice a week meetings were held with these representatives, lasting several hours, which was done during working hours, and, of course, they did not lose any pay for this. This was how various proposals coming from the Eastern workers were brought to the attention of the management via myself, and quite a number of these proposals were then actually put into effect. The organization of Eastern workers in groups, which was instituted by us as something entirely new, proved its value already after a short time, that about in May 1943, the camp management, which was appointed by the DAF, could be supplemented by an advisory council consisting of 3 Eastern workers who were able to guarantee orderly conduct in the camp to a large extent.

(page 6 of original)

8.) With the famous tradition for social work that the plant Ludwigshafen on the Rhine had, it was a matter of course that, after the plant had finally gained decisive influence, upon the Eastern workers' living conditions, housing, feeding, and general treatment of Eastern workers were handled in the best manner possible under the prevailing war situation at the time. I shall restrict myself in the course of my subsequent statements, to describing only the most important measures.

9.) All of the Eastern workers employed in Ludwigshafen-Oppau were in the course of time housed together in a camp which had developed from small beginnings into a large camp with more than 2,500 inmates. The barrack-type quarters were comfortably furnished. Every one of the barracks had steam heating, the steam of which was supplied by a pipe line from outside from the power plant Oppau. It goes without saying that the camp had electric lighting.

Separate laundry and bath houses were built for men and women in which hot water was available day and night. Half of every building was meant for body baths, and the other half was meant for the laundering of personal laundry. We built a large steam-heated modern kitchen with 16 cauldrons of a capacity of 300 liters each and with two cooling plants. In the spring of 1943 the whole camp was planted with lawns, numerous trees and flower beds, so that the camp gave a decidedly friendly impression. In spite of the cement shortage, all the roads and walks in the camp were cemented in the interest of cleanliness.

(page 7 of original)

When the female Eastern workers, and especially the Ukrainian women, wanted to decorate their rooms, they even received pictures as well as colored paper and other decorative articles from the plant, so that they could fashion from it the decorations on windows, doors, and walls that were customary in their country. The mess halls of the camp were without exception provided with a wooden floor and were furnished in such a way that theatricals and other entertainment could take place there.

10.) The food rations granted to the Eastern workers by the food offices were so deficient that Dr. WURSTER very soon gave permission to increase these rations, by circumventing official regulations, from the food stocks that were issued by the agricultural authorities to supplement rations for the German workers.

Dr. WURSTER was always very much concerned about the food situation. I can still remember that he, in person, and more than once, ordered the economic department of the plant to issue additional rations to the Eastern workers, of course within the scope of prevalent conditions at the time.

Beginning with the spring of 1943, a sales store was installed where Eastern workers could buy additional vegetables, fruits, etc. Another sales store was established for selling jewelry and small every day articles.

(page 8 of original)

11.) When the Eastern workers arrived, they were usually very badly dressed and had only very bad footwear. According to existing regulations, the economic offices could not issue them articles of clothing or shoes. Thereupon, partly from their own supplies, and partly by donations of employees, the plant issued enough articles of clothing so that all of the Eastern workers could be fully supplied. This also was a measure which was deeply appreciated by the Eastern workers.

12.) For the medical care of the Eastern workers, a dispensary, hospital, and day nursery were established in the camp. Besides these, there was of course a fumigation plant in which the clothes of the Eastern workers were disinfected in regular intervals. Special care was taken with medical attention in the camp. The department was headed by a Russian camp physician, Dr. BELYKH, who was aided by a Russian lay assistant as well as one or two nurses and several nurses' aides. Apart from that, the German plant physicians made daily inspection tours. The camp inmates were always in good health. There never were any epidemics or excessive cases of illness.

Many children were born in the camp itself. I should estimate about 80 to 90 in the course of time. The motherhood protection of the Eastern women workers was always subject to special governmental regulations. Beyond these regulations, the plant management ruled that expectant mothers had to be employed in the camp kitchens with light

(page 9 of original)

work already a considerable time before mother's protection as provided by law would apply, and that, after mother's protection had expired, they could remain in the camp kitchen. Mothers were generally employed in the kitchen up to 4 to 5 months after they had given birth; in addition, nursing mothers were permitted to go back to the camp during the nursing hours in order to nurse their infants.

The infants were issued baby things. There were baby nurses engaged for the care of the children. Mothers and children, thanks to the excellent medical care they received, were always in excellent health. I don't know of any cases of infant mortality.

11.) (misnomer; should read 13). With the married couples among the Eastern workers also came children who were still obliged to go to school - as far as I know, this happened contrary to the regulations issued by the German authorities. These children received instruction from a Russian woman teacher in a hut which was furnished especially for this purpose by the plant management. Educational material, notebooks, and writing material was also made available by the plant. These children who were going to school were not obliged to perform any kind of work during their free time.

Miners who were no longer going to school were treated in the same manner as the comparable age group among the Germans. They could either become apprenticed to a craftsman or they could perform light work as messengers or kitchen help. For the training of the young Eastern workers, instruction courses were given in which they could learn various trades, for instance cabinet making, locksmith's work, or electrician; many Eastern workers utilized this opportunity with diligence.

(page 10 of original)

12.) (Should read: 14) The net earnings of the Eastern workers were extremely low due to the tax for Eastern workers which was levied by the government. In order to help the Eastern workers in the plant to earn a just wage, Dr. WURSTER took it upon himself to order that they would be paid higher net salaries than provided by the regulations. Even after the most arduous hardships of the tax for Eastern workers were somewhat relieved after April 1943, Dr. WURSTER, on his own responsibility and risk, continued to see to it that the net salaries of the Eastern workers would afford them greater advantages than was provided for in the regulations.

13.) (Should read: 15) The freedom of the Eastern workers was severely restricted at the beginning by governmental instructions whose inspection was up to the Gestapo. Here too, Dr. WURSTER on his own responsibility and thereby undergoing considerable personal risk disregarded governmental regulations. The Eastern workers' camp only had a simple wooden fence like the one customary for fencing off gardens. Beyond that, already at the end of 1942, we disregarded government regulations also in other points, and gave the Eastern workers increasing freedom of movement outside of the camp. Several times some of our Eastern workers, who had been seen in shops or taverns contrary to government orders, were supposed to be punished by the police; however, the plant management was successful in seeing that these people were not punished or that punishment was rescinded, and to maintain for the Eastern workers the freedom of movement granted them by the plant management.

(page 11 of original)

Beyond all that, the plant made application to the competent authorities at various times for permission to let the Eastern workers during their free time make excursions in the neighborhood. The plant Ludwigshafen was one of the first larger plants actually to receive permission to let small groups of Eastern workers, accompanied by a German employee of the plant, make excursions.

From the beginning of December 1942, several groups were permitted to leave the camp for 5 or 6 hours on Sundays even alone, and later on the whole camp was granted permission for unrestricted leave from the camp during their time off.

Here too there were grave difficulties that had to be met. Several weeks after this general leave permission was granted, the Gau administration, because of some special occurrences, withdrew the permission to leave the camp for the whole Gau. When, however, the plant management stated that it would assume the responsibility for the good conduct of the Eastern workers, they were able to see that the Eastern workers of the plant Ludwigshafen were not affected by this order, and could leave the camp freely as before. Furthermore, the plant management was able to effect that Eastern workers, who at the beginning had been prohibited to use the railroads, would be granted a travel permit in order to visit friends or relatives in different places, and the plant was responsible for the return of the Eastern workers.

(page 12 of original)

14.) (Should read: 15) I myself always applied the greatest care to recreational activities. At the beginning, recreational activities only included concerts which were presented by a choir group of White Russian (emigrants). But very soon the Eastern workers established their own groups who would offer plays, concerts, and other entertainment. For this purpose the plant management even purchased musical instruments.

Part of the mess hall was fixed up as a stage, material, paints, etc., for making scenery were provided, and stage lighting was installed. Russian plays were made available, and, as long as the camp was not subjected to continual airraids, regular performances of the various artistic groups took place. These evenings were very well attended, and contributed appreciably towards making the life of the Eastern workers more comfortable.

The Eastern Worker's Choir with its many excellent voices was regarded as an outstanding choral group. From time to time movies were also shown that were very well attended.

In the course of time, the plant management established a Russian library for the use of the Eastern workers; Russian literature was distributed in the day room as well as various games, like chess, halma, and others.

(page 13 of original)

In the spring and summer, Russian folk dancing evenings could be held on a large square which was cemented especially for this purpose. There was a loudspeaker on this dancing square which reproduced radio and record programs. The dance group of the Eastern workers occasionally also gave recitals in a hall belonging to the plant for an audience composed of foreign workers of different nationality as well as Germans, and received special compensation for these performances in tobacco rations, linen, etc.

Similar theatrical groups among the other nationalities also gave their performances in the Eastern Workers camp.

In addition, sports were carried on, the requisite clothing and equipment being provided by the plant. The Eastern workers had their own football and handball teams, which played matches against teams of other nationalities.

Moreover, Eastern workers who were particularly skilful could do woodwork, metal work, basket weaving and sewing in craft shops.

At Christmas 1943, an exhibition of this work was held for the first time and was very successful.

In addition, language courses were held so that the Eastern workers could learn German. A plant engineer had published a primer which transmitted the vocabulary needed for everyday purposes in an entertaining and original manner.

(page 14 of original)

15.) Under the regulations of the Reichsfuehrer SS, the Eastern workers were forbidden to attend any religious services. In Ludwigshafen itself there were two priests who hold regular religious services for the Russian emigre colony. One of these two priests, G. STCHERSININ, tried to obtain permission to hold services in the camp, but the Gestapo would not allow it. But at least we succeeded in getting this priest admitted in order to christen 23 newly-born children shortly before Easter 1943.

Later, many Eastern workers attended religious services during their Sunday outings.

In the camp an Eastern worker named KARMNEVICH, who had been a deacon, held prayer meetings for small groups. We tried to borrow a Russian Bible and altar pieces for Herr KARMNEVICH from orthodox priests, but they disapproved of the conducting of religious services by a layman and refused.

In the Eastern workers camp there were also a number of Baptists, who regularly held religious services among themselves and were given the opportunity to do so regularly.

Ludwigshafen/Rhine, 1 February 1948

(Signed) K. SCHAEFER

The above signature of Herr KURT SCHAEFER of Kirchheimbolanden, Schlosstr. 37, was affixed before me, Dr. Wolfgang HEINTZELER, Ludwigshafen/Rhine, Bruckstr. 13, and is hereby certified and attested by me,

(Signed) Dr. Wolfgang HEINTZELER

Attorney

Copy

Affidavit.

I, Oskar HERMANN, residing in Ludwigshafen on the Rhine, Woblerstrasse 11, having been cautioned that I render myself liable to punishment for false statement, hereby declare on oath that my statement conforms to the truth and that it was made to be submitted as evidence before the Military Tribunal at the Palace of Justice in Nuernberg, Germany.

On 17 June 1917 I entered the employ of the Ludwigshafen-Oppau plant which belonged to what later became the IG Farben Industrie Aktiengesellschaft; during the war I was chief of the payroll section in Ludwigshafen. In this capacity I was during the war in charge of the entire wage calculation including the wages of foreign workers. On the basis of my experiences there I am informed about the following facts concerning the treatment of Eastern workers in the Ludwigshafen-Oppau plant:

1. In theory the Eastern workers received the same wages as any other foreign worker, but in effect they only received a very small net wage on account of the Reich Law regulations which provided for a very high deduction for Eastern workers. Dr. WURSTER as plant manager of the Ludwigshafen-Oppau plant, to whom I reported directly at certain intervals concerning the problem of wage calculation, was greatly worried about this pay of the Eastern workers;

(page 2 of original)

with reference to the wage calculation of the foreign workers in general and the Eastern workers in particular he instructed me repeatedly in cases of doubt always to decide in favor of the employee.

2. In addition, Dr. WURSTER at least as far as the Ludwigshafen-Oppau plant was concerned made continued attempts to bring about a relaxation of the regulations concerning the deduction for Eastern workers which caused great hardship. In this connection he sent me to Berlin twice to the competent Reich ministries to conduct negotiation with them about mitigation of the deduction for Eastern workers for our plant or about the possibility of any other privilege for the Eastern workers employed in our plant. Unfortunately these negotiations always ended with negative results as the competent ministries held that no changes could be made for individual plants where principles dictated by the Reich government were concerned.
3. Furthermore Dr. WURSTER repeatedly took it upon himself to grant the Eastern workers of the Ludwigshafen-Oppau plant special financial privileges contrary to the legal regulations. The Reich Law regulations provided that for each Eastern worker a daily deduction of RM 1.50 (RM 45,— per month) had to be made for quarters and subsistence.

(page 3 of original)

During the first months of the assignment of Eastern workers at the Ludwigshafen-Oppau plant Dr. WURSTER instructed us to abstain from the deductions for quarters and subsistence contrary to legal regulations so as to make it possible to pay the Eastern workers a more adequate net wage. After we had proceeded in this way for several months, action was taken from above which rendered the continuation of this practice impossible; this greatly disappointed Dr. WURSTER.

4. As most of the Eastern workers arrived at the Ludwigshafen-Oppau plant with very inadequate clothing, the plant management, following Dr. WURSTER's initiative, in November and December 1942 arranged for a large scale clothing drive on behalf of the Eastern workers. The plant bought apparel in large quantities and all male and female Eastern workers without exception received an entire new outfit. According to legal regulations the Eastern workers had to be charged also with the expense for these clothes. However, Dr. WURSTER on his own responsibility gave the directive that in all cases in which the deduction for the supply of clothing would cause hardship to the person concerned, no deduction was to be made; the result of this directive was that in effect not a single male or female Eastern worker had to pay for the clothing provided by the plant.

(page 4 of original)

5. Upon arrival, the payroll section always gave the Eastern workers an advance payment of RM 10,— so that they should have some pocket money until the first payday. Contrary to legal regulations, and in compliance with Dr. WURSTER's directive there was not a single case in which a future deduction was made for this advance payment.
6. In conclusion I should like to say that Dr. WURSTER took very great trouble over the welfare of the foreign workers and in particular the Eastern workers, and he devoted himself in the most selfeffacing manner, partly taking great personal risks, to the task of helping the Eastern workers in every possible way.

Ludwigshafen on the Rhine, 23 September 1947.

signed: Oskar HEIMANN

I, Dr. Wolfgang HEINTZELER, residing in Ludwigshafen on the Rhine, Bruckstr.13, hereby certify and testify the above signature of Herr Oskar HEIMANN, residing in Ludwigshafen on Rhine, Woehlerstr. 11, which he executed in my presence.

Ludwigshafen on the Rhine, 23 September 1947.

signed: Dr. Wolfgang HEINTZELER

Copy

Affidavit.

I, Eugen MINZENMAY, born 23 February 1891 in Ludwigsburg/Wtbg., residing in Speyer on the Rhine, Ludwigstr. 14, having been cautioned that I render myself liable to punishment for false statement, hereby declare on oath that my statement conforms to the truth and that it was made in order to be submitted as evidence before the American Military Tribunal at the Palace of Justice in Nuremberg, Case 6.

From 1937 to 1945 I was in charge of the Labor Office for the Palatinate in Ludwigshafen on the Rhine and had the official designation of Regierungsdirektor. At present I am referent at the Regional Labor Office for the Palatinate in Neustadt on the Haardt.

On the strength of my experience as director of the Labor Office in Ludwigshafen on the Rhine I can state the following:

During the war when foreign labor, among them Eastern workers were assigned to work in the enterprises in Ludwigshafen, the plant managers, on the occasion of plant managers' meetings at the Labor Office in Ludwigshafen on the Rhine, spoke with great fervor in favor of better conditions for the Eastern workers.

The position was such that by virtue of Reich Laws the wages of the Eastern workers were lower than the wages of the other foreign workers, due to the fact that they received only part of their pay while the remainder was used for other purposes.

The plant managers, among them above all the manager of the biggest plant, Direktor Dr. WURSTER,

Document Book IV WURSTER
Document No. 144
Exh.No.....

(page 2 of original)

demanded time and again that the pay of the Eastern workers be adapted to the pay of the other foreign workers. To my knowledge the demand for equal conditions for the Eastern workers was nowhere else advanced with so much emphasis as in the district of Ludwigshafen on the Rhine and by Dr. WURSTER.

Ludwigshafen on the Rhine, 21 November 1947.

signed: Eugen MINZENMAY

I, Friedrich Wilhelm WAGNER, Attorney-at-Law, Ludwigshafen on the Rhine, hereby certify and testify the above signature of Herr Eugen MINZENMAY which he executed in my presence.

Ludwigshafen on the Rhine, 21 November 1947.

signed: F.W. WAGNER
Attorney-at-Law

Copy

Excerpt from Prosecution Document NO. NI-6315

Exhibit No. 1339, Volume 69,

Board meeting in Ludwigshafen on the Rhine on 19 April 1943.

(Page 1 of the original)

.....

The new legal regulations governing the payment of Eastern workers were read out. As mess fees had at the same time been increased to RM 45,— a month, the decrease of expenses for Eastern workers had been so negligible that it would fail completely in stimulating their enthusiasm for work. It was decided to take further steps.

.....

This is to certify the correctness of above excerpt.

Nuernberg, 20 March 1948

signed: Dr. Wolfgang HEINTZELER
Attorney-at-law.

Document Book IV MURSTER
Document No. 511
Exh. No.

Copy

Secret State Police
State Police Office Saarbrücken
Branch Office
Ludwigshafen on the Rhine

B. No. 591/42.

Ludwigshafen on the Rhine,
26 August 1942.

To:
The Plant Manager
of the I.G. Farbenindustrie A.G.

in Ludwigshafen on the Rhine.

Subject: Assignment of Eastern workers.

Previous communication: None

In the Russian Camp IV of the I.G. Farbenindustrie attempted escapes on the part of Soviet civilian workers have recently taken on dangerous dimensions. In the course of a camp inspection it was found that there are not enough guards. The camp counts a staff of 1200 men which requires a minimum of 40 guards.

Only part of the camp is fenced off, which increases the danger of escapes on the part of the Eastern workers.

I request that immediate action be taken to remove the above mentioned abuses and wish to be informed of the result.

As Deputy:
signed: signature

No.

Copy

Affidavit

I, Heinrich FALLER, born 2 February 1889, residing in Ludwigshafen on the Rhine-Gartenstadt, Eschenweg 4, having been cautioned that I render myself liable to punishment for false statement, hereby declare on oath that my statement conforms to the truth and that it was made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice in Nuernberg, Germany, Case 6.

1. During the war I was in charge of the factory police service at the IG plant in Ludwigshafen-Opau. Through my experience there I know that the Secret State Police had issued very detailed regulations concerning the guarding of all Eastern workers employed in the German industry. From time to time the Secret State Police made checks to ascertain that these regulations were put into effect.

2. In the late summer of 1942 the Secret State Police inspected the Ludwigshafen-Opau plant and made a considerable number of complaints. These complaints were subsequently confirmed in a communication dated 26 August 1942. Objections were raised therein against insufficient guards and against the fact that the camp of the Eastern workers was only partially fenced off. The plant was charged with the removal of these conditions giving rise to complaints and the plant had to report to the Gestapo that the directives had been complied with.

(page 2 of original)

3. As the plant management endeavored as much as possible to circumvent the rigorous regulations for the treatment of Eastern workers, the plant management on its own responsibility failed to alter prevailing conditions and, after some time had elapsed, sent the Gestapo an implementation report without having effected any changes.

4. The plant management tried also in other fields to create more favorable conditions for the Eastern workers employed in the plant. I know f.i. that the Ludwigshafen-Opau plant was the first industrial enterprise in that district which gave the Eastern workers a chance for time out.

Ludwigshafen on the Rhine, 30 January 1948

signed: Heinrich FALLER

I, Dr. Wolfgang HEINTZELER, Ludwigshafen on the Rhine, Brundstr. 13, hereby certify and testify the above signature of Herr HEINRICH FALLER.

Ludwigshafen on the Rhine, 30 January 1948

signed: Dr. Wolfgang HEINTZELER
Attorney-at-Law.

Copy

Labor Office Ludwigshafen on the Rhine

Reference: IVa - 551c -

Ludwigshafen on the Rhine,
4 April 1942.

To:

I.G. Farbenindustrie AG.

in Ludwigshafen on the Rhine

Subject: Assignment of Eastern workers; this: treatment of pregnant
Eastern workers.

To gain an overall picture at this early date as to the possibilities of retaining pregnant Eastern workers and Eastern female workers with children in the individual plants or how to place them in the near future, you are requested to answer the following questions:

1. Have you as yet made provisions for accommodating Eastern workers who give birth to children?
2. How many persons can be accommodated?
3. Have you made arrangements for accommodating the new-born children of Eastern female workers?
4. What steps have you taken for the employment of pregnant Eastern workers for the time preceding and following confinement?
5. Are you willing to make your accommodations also available to Eastern workers from other plants, provided that the persons concerned will be assigned to your plant after the confinement?
6. Have you taken steps for the provision of the above mentioned accommodations and can you state the date these accommodations will be ready for use?

You are requested to submit concise answers to these questions not later than 7 December 1942, quoting reference number IVa - 551c.

By Order:
signed: SIMON

(page 2 of original)

Copy

I. G. FARBENINDUSTRIE AKTIENGESELLSCHAFT LUDWIGSHAFEN ON THE RHINE

To:
The Labor Office

Ludwigshafen on the Rhine

Reference: IVa-551a-

4 December 1942

8 December 1942
M.

Assignment of Eastern workers; thist treatment of pregnant Eastern
workers.

We are replying to your questions as follows:

1. Have you as yet made provisions for
accommodating Eastern workers who give
birth to children? Yes.
2. How many persons can be accommodated? 15 to 20 babies and
mothers of new-born children.
3. Have you made arrangements for ac-
commodating the new-born children of
Eastern female workers? Yes, kindergarten
with children's nurse
and schools.
4. What steps have you taken for the
employment of pregnant Eastern wor-
kers for the time preceding and fol-
lowing confinement? The Eastern female
workers will be employed
in the kitchen 4 weeks
prior to the confinement
and 4-6 weeks following the
confinement (according to
the period during which
the mother nurses the
child).
5. Are you willing to make your accom-
modations also available to Eastern
workers from other plants, provided
that the persons concerned will be
assigned to your plant after the con-
finement? Owing to lack of space,
no.

Document Book IV WURSTER
Document No. 529
Ref. No.

(page 3 of original)

6. Have you taken steps for the provision of the above mentioned accommodations and can you state the date these accommodations will be ready for use? Has been completed for some time.

Heil Hitler !

I.G. FARBEN-INDUSTRIE AKTIE-GESELLSCHAFT

Personnel Section

signed: HOFFMANN

Copies to:
Dr. KRAFFT
Herr JUNKERS/KOENIG
Herr KUHLMANN

COPY

AFFIDAVIT

I, Ludwig Zbell, born on 15 November 1915, in Matsdorf, Czechoslovakia, at present residing in Ludwigshafen on the Rhine, Brennerstrasse 8, have first been cautioned that I make myself liable to punishment by rendering a false affidavit. I herewith declare on oath that my testimony is true and was made in order to be submitted as evidence to the Military Tribunal at the Palace of Justice, Nurnberg, Germany.

On 15 July 1940, I arrived together with several hundred other comrades at Ludwigshafen on the Rhine in a mass transport. Up to that time, we had been serving in the Slovak Army and we had now been discharged in accordance with a directive from higher quarters which stated that we would serve the remainder of our two years military duty in form of a labor assignment in Germany. In Ludwigshafen on the Rhine, I was assigned to the I. G. Farben Gesellschaft and since I am a butcher and cook by profession, I was sent to the Household Division. Here I was put to work in the kitchens of the various community camps until 1945. At first I was assigned as first cook in the kitchen which was serving primarily Slovak workers. This was done mainly because I knew what the Slovaks liked to eat and therefore could more easily comply with the wishes of the Slovaks.

I was responsible for breakfast, lunch and dinner and for issuing the required amount of food on the basis of food ration coupons.

Page 2 of original

In the kitchen in which I worked at first, some three hundred to four hundred people were fed in the beginning. Later there were more than one thousand. These were primarily Slovaks and Germans. The kitchen itself was large and spacious. The floor was concrete and fitted with a number of drains. Hot and cold water was available at all times. For the purpose of preparing the meals, we had four electric

Page 2 (continued)

cooking vats, two electric fryers and two large electric stoves and two large meat grinders. Twenty to twenty-five men and women of various nationalities were employed as helpers.

During the years 1943 to 1945, I was employed in the kitchen which fed the workers from Russia. The kitchen itself was even more beautiful than the one in Camp I. It was the most beautiful kitchen of all the community camps; it was equipped with sixteen 300-l steam vats, four electric dump fryers, two electric stoves, four electric broilers and two meat grinders. About one hundred people, mostly Russian women, were employed as helpers. Two thousand five hundred to three thousand people were fed here daily. The food was plentiful and wholesome and prepared only with the best materials. The staple foods were delivered to us once a week on the basis of our requisition. Perishable foods, such as meat and sausage, we always received one day prior to their use. The food was consumed in a dining hall which was directly adjacent to the kitchen. During the years 1940 and 41, food was more plentiful than later on, however, even then it was attempted to bring variety into the food, to prepare it tastily and according to the wishes of the various nationalities.

Page 3 of original

In order to be able to better understand the Russians, I learned Russian in my spare time in the Berlitz school in Mannheim.

Cooperation between me and my superiors was very good and I was given every possible assistance. I earned fairly good money in the beginning, approximately 35 Marks net per week, and later when I was permanently employed, I received approximately 300 Marks net per month. Food and quarters were free. In my spare time, I could do whatever I pleased. I had complete freedom of movement and was not subject to any sort of control.

Finally, I want to say that after air raids, the superiors always

Page 3 (continued)

came directly to the kitchens to ascertain the damage and to arrange for the uninterrupted distribution of food. During air raid alarms, we could go to two nearby bunkers.

Ludwigshafen on the Rhine,

23 October 1947

signed, Ludwig Zbell.

The above signature of Zbell, Ludwig, of Ludwigshafen on the Rhine, Brumserstrasse 8, given in the presence of attorney-at-law Friedrich Wilhelm Wagner, Ludwigshafen on the Rhine, is herewith witnessed and certified.

Ludwigshafen on the Rhine,

23 October 1947

signed, F. W. Wagner.

COPY

I. G. Community Camp IV
Ludwigshafen on the Rhine,
5 September 1942.

To: Fraulein Reichl
Household Division
Anilinstrasse 4 A

Subject: Recreation time activities for Eastern workers in Camp IV.

In I. G. Camp IV, a sport group was formed consisting of sixteen men and eighteen women.

1.) Group for volleyball, fifteen men and six women. Sport evenings, Tuesday from 1930 to 2100 hours, Saturday from 1700 to 1900 hours under the supervision of Eastern worker Swikis.

2.) Group consisting of twelve women and one man (calisthenics) under the supervision of Tschersowwa. Training period, Saturday from 2000 to 2200 hours.

Young people's group consisting of ten children under the supervision of the woman teacher Schokotko. Sports and games every noon from 1500 to 1700 hours.

Dance group consisting of twelve women under the supervision of Kitaigowa. Training period Wednesday and Friday from 2000 to 2200 hours.

Theater group consisting of eight men and ten women under the supervision of Zeluiko. Training period Tuesday and Friday, 2000 to 2200 hours.

Chess group under the supervision of Golodenenko with twenty members. Period of games Saturday from 2000 to 2200 hours.

(Page 2 of original)

Choir group consisting of twelve men and eleven girls.
Singing practice Monday and Thursday from 3000 to 2200 hours
in the schoolroom.

There is also great interest in German-Russian language
classes. There are already some 300 participants.

Camp leader
signed, SALES

COPY

I. G. Community Camp IV

Program for the Christmas and New Years holidays.

Day and date	Short summary of contents	Performer
Saturday, 18 Dec. 43 1600 hours	Award of the pendants to the female Eastern workers of quality group 1-A. Address by Senior Engineer Hoffmann.	Senior Engineer Hoffmann
Sunday, 19 Dec. 43 1000 hours	Religious assembly for camp inmates.	Kabanowitch
Friday, 24 Dec. 43 1000 hours	Christmas presents for the camp inmates.	
Saturday, 25 Dec. 43 1600 hours	Performance of concert and play.	
Sunday, 26 Dec. 43 1000 hours	Religious assembly for camp inmates.	Kabanowitch
1600 hours	Concert	
Saturday, 1 Jan. 44 1600 hours	Performance of concert and play.	

COPI

I. G. Community Camp IV

Program for the Christmas and New Years holidays.

Day and date	Short summary of contents	Performer
Saturday, 18 Dec. 43 1600 hours	Award of the pendants to the female Eastern workers of quality group 1-A. Address by Senior Engineer Hoffmann.	Senior Engineer Hoffmann
Sunday, 19 Dec. 43 1000 hours	Religious assembly for camp inmates.	Kabanowitch
Friday, 24 Dec. 43 1000 hours	Christmas presents for the camp inmates.	
Saturday, 25 Dec. 43 1600 hours	Performance of concert and play.	
Sunday, 26 Dec. 43 1000 hours	Religious assembly for camp inmates.	Kabanowitch
1600 hours	Concert	
Saturday, 1 Jan. 44 1600 hours	Performance of concert and play.	

COPY

Herrn Oberregierungsrat Cossmann
Reichs Commissioner for Labor Allocation
Berlin

Personnel Division
Dr. U/S 7 November 1942

Dear Herr Oberregierungsrat,

We have referenced to your recent visit to our camp for Eastern workers. At that time, we told you of our intention to found a camp paper also for our Eastern workers in about the same manner as for the inmates of other camps, since we regarded this as a particularly effective means of guidance for the people in this camp. However, this plan has been opposed by the competent Gestapo office in Saarbrücken, particularly in regard to an article about the children born in the camp which seemed to us to be especially important from the psychological point of view.

We have compiled a draft of the planned newspaper and in the enclosure we are sending you a copy of this draft. Perhaps it will be possible for you to achieve a general agreement with the Central Police Offices on the question of camp papers of this type for Eastern workers so that outlying offices will not be able to cause trouble. Since we consider the matter as very urgent, we would greatly appreciate early information of your opinion.

The camp paper would, of course, not be in German but in Russian.

(Page 2 of original)

Heil Hitler!

I.G. Farbenindustrie Aktiengesellschaft

signed, REISS signed, As Deputy STARK

Copy of this to Herr BAASCH, Gebechem, Berlin, with a request for
suitable action.

Copy for Herr Dr. REIDE, DAF. Neustadt.

Copy:

Camp
Paper for the
Community Camp IV
Ludwigshafen on the Rhine

East

Work
of the I.G. Farbenindustrie
Aktiengesellschaft

Spring 1944

Cut

A Letter from Home.

A letter from home changes the work day into a holiday. The white sheets of paper covered with a beloved handwriting bring a greeting from home and the heart-felt remembrance of family relatives, and friends across the far reaches of the land. The news which it contains informs us of the good and bad, the happy and the serious events at home and they build a bridge between here and there. It is not read once only; during the breaks in the work and on holidays, it is always pulled out again and when it is finally put aside, one almost knows it by heart. K.K.

Recreation

It would be a mistake were we to understand by "recreation" only the narrow field of entertainment offered on Sundays and holidays, such as concerts, vaudeville shows, plays, and so on. This concept includes the whole measure of cultural activity by the camp inmates which should beautify the leisure hours after work as well as the leaves and days off. When the Russians say, "Samodjejatelnost", i.e., "self-occupation", they mean by that exactly that kind of activity for relaxation. Therefore, it does not refer only to "amusements" or "entertainment" which is provided by professionals, artists and actors, but it requires the participation of all camp inmates. It is not the exceptional performance of a small group of especially gifted people

(page 2 of original)

who live in especially favorable circumstances created for them; even less stupefying "cardplayers" or the dangerous gamblers who are chosen for this - everyone should participate, should help according to his best ability and desire. To celebrate holidays does not in itself constitute the art of living. It is rather to steal a free hour from the burden of the dreary average day and to gain pleasure and strength for work from this hour - this is our privilege and our duty. When we do this, it will be easy for us to spend the rare holidays of our working year in such a manner that the memory of the happy days we spent will long remain with us.

No one will deny that it is certainly not easy today, in the middle of the war, to do those things which were offered to us in plenty in peacetime. Therefore, the constructive work which has been done in our camp in this field during the last months is especially commendable. Under the competent guidance of the camp management, the theater group and the choir were reorganized, strengthened, and renewed. How much pains did the "actors", singers, and other artists take, and how many free evening hours did they sacrifice for rehearsals in order to be able to provide pleasant hours for their comrades. Here we can see immediately the change, the desire for closer personal contact and the inclusion of a large number of the camp inmates.

Small drawing

End of Page 1 of original

3 cuts

In the arts and craft shop

Photo: Lichtbildbetrieb

The program is interrupted by "general dances", and everyone can dance to the beautiful melodies of Ukrainian and Russian folk tunes.

(page 3 of original)

Prior to the Christmas holidays, activity in the "arts and crafts shop" was in high gear. Busy hands made toys of all kinds, baskets and bags, etc. and thereby gave the camp management the opportunity to bring joy to many children and also to provide many a grownup with a useful present. Nor is the "shop" idle today. On the contrary, the changeover to the needs of every day life stimulates the inventive genius and the practical sense of the hobbyist even more. Apart from its practical side, the shop also has a great social value, for it makes it possible for the camp management to provide occupation and earnings for the invalids who cannot be used in the factory. They, too, need not and should not spend the day uselessly; they, too, belong to the ranks of those who do constructive work.

Neither should we forget the artists who paint and draw. How they love to put the skill they have acquired at the academy in the service of the cause. And what joy do they give to all camp inmates by decorating the camp stage with a magic reproduction of an Ukrainian land-scape. With how much love did they paint the toys. Even the articles of daily use are made pleasant. But not even that exhausts their art. Their great ability makes it possible for them to create oil paintings and drawings of great value. The equipment of the nursery has been turned over to them and there are rumors about prizes for rooms whose inhabitants distinguish themselves by particular cleanliness and orderliness.

A chess group has been formed by those who adhere to the royal game. Chess boards and figures are easily made and soon the "parties" meet in peaceful combat. A chess tournament is to take place soon, the "Bogolubow" of the camp will be ascertained.

(page 4 of original)

The camp management has provided a well-stocked "library", numerous volumes of all fields of literature give everyone the opportunity to entertain himself and to increase his knowledge. Ukrainian and Russian newspapers and magazines provide for change and enjoyment. In order to bring about a closer relation between the camp inmates and the camp management and to insure prompt information on all questions of camp life and work a "wall newspaper" is issued three times a month. Spirited debates regarding the articles appearing in it prove what great interest exists in this new enterprise. As the name "Camp Life" implies, this paper is a true reflection^{of} life in the camp.

The camp management has met the ever-increasing demand for religious activity by obtaining permission for religious gatherings. These take place twice a month on Sundays under the guidance of a lay minister. The church choir completes these gatherings as well as the celebrations of baptisms and marriage. Not only do the children learn the German language, but all those who are active as members of the self-administration or in the camp administration were forced to take part in the instruction. Even if it is necessary to sacrifice an hour of rest for this, all are enthusiastic about it, especially since the instruction does not limit itself to teaching the language but also affords the student an insight into the concept of German life, German work, and German culture.

Soon it will be spring again, and then we will assemble for outdoor sports and we will again liberate up by this training using our gymnastic equipment. And then when summer comes, the little men and little women will again happily splash in the camp emergency water tanks.

We gain strength through the joy which we find in the manifold ways of our recreation!

(page 5 of original)

The Savings Bank for Eastern Workers.

The Savings Bank for Eastern Workers, which has been in existence for over a year, has been reorganized. Up to now, deposits have been completely unplanned, but now they are made dependent on the earnings. Fully employed persons pay four marks a month, young people two marks and Eastern workers who are sick do not have to pay anything during the period they are unable to work. Through this reorganization we now have an orderly payment. The deposits have increased from approximately three hundred marks per month to approximately four thousand five hundred marks after the reorganization. After the expected change in the income of the Eastern workers, a doubling of the deposits will be possible without noticeable effect on the individuals.

Plan for your future, save through the Saving Bank for Eastern Workers !
Easter.

During the early morning hours, the camp inmates assemble for the Easter service. The minister and the church choir are already waiting for them. Deeply moved, the congregation listens to the Easter hymns, which are unknown to the young people among them. Raised in a country which once celebrated Easter with a pomp that had almost no equal, these people were deeply moved that here in a strange country they were given a thing of which they had heard from their fathers but which they themselves could only dimly imagine. Colored Easter eggs and cake were enjoyed by the kids as well as the grown-ups. The celebration ended with the congregational singing of the Easter greeting.

End of Page 2 of the original

Cut

Pendants for Female Eastern Workers.

Medal "for excellent work" For particularly proven Eastern workers, the quality category I-A was introduced.

(page 6 of original)

This classification is awarded only on special recommendation of the factory management or the camp management for those 3 Cuts male and female Eastern workers who have proven that they are an example for the others not only because of their exemplary conduct but because they are also able to complete the tasks assigned to them independently. In December 1943, thirty-one female Eastern workers could for the first time be put into quality category 1-A and be distinguished by the pendants created for them. For the celebration in community camp No. 4, a great number of the plant executives had appeared. In his address to the female Eastern workers who were thus distinguished, Senior Engineer HOFFMANN spoke as follows: "You who have come to Germany a few months ago in order to help us in the achievement of those tasks which were put upon us by the war, have earned for yourselves the respect of your German fellow workers by your diligence and by your good conduct. In addition to the special privileges which have been introduced for you, the management wanted to give you some special pleasure and therefore created this pendant. You can wear it proudly because the recognition of an achievement is the highest reward a man can earn. The management hopes that you will express your thanks by putting forth the same effort in future also, and by continuing to be an example for your comrades and by encouraging them to just such achievements".

Cut One of the Eastern workers thus decorated thanked Senior Engineer HOFFMANN for his words and promised in the name of all to make an effort to be worthy of this recognition.

(page 7 of original)

The celebration which had included presentations by the camp orchestra and the choir concluded with the award of the pendants by Reulein NEIDLINGER, the social worker.

Registration of Couples Among the Eastern Workers.

On Sunday, 30 January 1944, 141 couples were registered by the camp management in community camp No. 4. Of these, seven couples had been single, whereas the others were already living together in the married quarters, but did not possess any documents regarding the marriage which had taken place.

The simple ceremony was augmented by presentations by the camp orchestra and the camp choir. In his address, the counselor explained that this registration was of the greatest importance to the Eastern workers. It gives them the opportunity to tighten loose bonds but it also charges the couples with the responsibility of living an exemplary life in the sight of the other camp inmates.

Religious Gatherings.

In order to fulfill the desire of the Eastern workers for religious activity, the camp management has obtained permission to hold religious meetings in the camp. The newly created church choir completes these gatherings. The very active participation of the Eastern workers in the assemblies proves the grateful recognition of the Eastern workers of the welfare measures of the camp management.

Baptizing Eastern Workers' Infants.

On 1 January 1944 infants born to Eastern workers were christened by a Russian priest in Camp IV. 23 proud mothers, accompanied by fathers, god-parents, and various friends were assembled in the dining room which had been specially decorated for the festivity. Music of the church choir accompanied the ceremony.

(page 8 of original)

Birthe in Community Camp IV.

Since 1 July 1943, 51 children were born to Eastern workers in community camp IV. Therefore, not only the nursery was enlarged and a room equipped suitable for the free movement of the babies, but the nursing personnel was also increased. In the course of sanitary and health measures, a Red Cross sister was engaged to supervise the food for the infants. Furthermore, a second camp physician was employed.

End of page 3 of original

We Aim at Cleanliness.

Sketch.

The word cleanliness ought to be understood by everyone. Above all, if many people live together in a community, every individual must observe the greatest care with regard to tidiness and cleanliness, so that the very appearance of living rooms and community rooms makes life more comfortable. The outward impression of order which should be characteristic for a community camp, should not be impaired by the untidiness of the rooms and of the inmates themselves. It is not only a question of beauty which is involved here, not a problem of better or worse appearance, but rather a sanitary one. Every camp inmate must at some time be aware of the consequences of uncleanness. These little animals which molest some people now

and again, are actually disease carriers, as for

Sketch

instance the body louse which is a typhus carrier.

Has anybody ever tried to visualize what a

typhus epidemic in a camp would mean? How many camp inmates were disgruntled if once in a while they had to leave their barracks for a night and a day, because those barracks were being disinfected?

(page 9 of original)

In time we would like to achieve the point when these disinfections and the unpleasantness connected with them are restricted to the absolute minimum, but to reach this point every camp inmate will have to do his share. Cleanliness will have to become a basic principle for everyone. It must be a matter of course that everyone, on his own initiative, helps to support the endeavors of the camp management to keep the camp clean.

All these little animals, the various types of lice, fleas, and other unpleasant visitors, live off the human body. They can only survive if the individual does not take adequate care of his personal cleanliness. The management has created all hygienic conditions necessary in this respect. Every one of our community camps has sufficient baths, showers, and lavatories. But these installations are not intended to be ornaments, they should be utilized to the fullest. Can anybody be comfortable who goes to bed at the end of the day undressed and covered with the dirt of the day's work? Unfortunately, it can be observed that some people do just that. Should we have to resort to compulsory showers? The room mates themselves might be able to entice water-shy heroes to observe the rules of cleanliness. If, during an evening visit one happens to lift a straw sack from the floor, one is apt to find all kinds of things dispersed under it. There are rags, dirty socks and laundry, old and used paper,

which could well be used for better purposes,

Sketch

even remnants of food can be found, quite

apart from a sizeable amount of dust. The barrack cleaner alone cannot cope with this. It would mean that he could never finish his work. But one should assume that it is common knowledge in all countries that garbage is not to be kept under the sleeping quarters, and that dirty laundry is to be washed and not to be buried for weeks on end under a straw sack. Such corners are breeding places for vermin. Then there are other rooms which are striking because of their cleanliness, and which can be set as an example

(page 9 of original)

In time we would like to achieve the point when these disinfections and the unpleasantness connected with them are restricted to the absolute minimum, but to reach this point every camp inmate will have to do his share. Cleanliness will have to become a basic principle for everyone. It must be a matter of course that everyone, on his own initiative, helps to support the endeavors of the camp management to keep the camp clean.

All these little animals, the various types of lice, fleas, and other unpleasant visitors, live off the human body. They can only survive if the individual does not take adequate care of his personal cleanliness. The management has created all hygienic conditions necessary in this respect. Every one of our community camps has sufficient baths, showers, and lavatories. But these installations are not intended to be ornaments, they should be utilized to the fullest. Can anybody be comfortable who goes to bed at the end of the day undressed and covered with the dirt of the day's work? Unfortunately, it can be observed that some people do just that. Should we have to resort to compulsory showers? The room rates themselves might be able to entice water-shy heroes to observe the rules of cleanliness. If, during an evening visit one happens to lift a straw sack from the floor, one is apt to find all kinds of things dispersed under it. There are rags, dirty socks and laundry, old and used paper,

Sketch

which could well be used for better purposes, even remnants of food can be found, quite apart from a sizeable amount of dust. The barrack cleaner alone cannot cope with this. It would mean that he could never finish his work. But one should assume that it is common knowledge in all countries that garbage is not to be kept under the sleeping quarters, and that dirty laundry is to be washed and not to be buried for weeks on end under a straw sack. Such corners are breeding places for vermin. Then there are other rooms which are striking because of their cleanliness, and which can be set as an example

(page 10 of original)

All rooms ought to become that way. Every individual camp inmate should consider himself an enemy of all vermin and fight it with every possible means. It is not so hard, after all, to shake a straw sack and to turn it; and aboveall, not to lie on it in dirty work clothes or even with boots. Everybody has to show only a little understanding and a little good will, and then he will feel more comfortable in his room.

For the time being, however, we are still forced to fumigate. A new regulation is to ensure, in the future, that the decontaminations are carried out without friction. The inhabitants of the rooms to be fumigated will be informed in writing of the impending action by the camp commandant. Time and temporary quarters will be announced. Everybody is to take their valuables, food, and other perishable commodities, as well as their lighters, with them. Blankets are to be checked with the barracks leader. Bags and baggage are to be taken along to the fumigation site, they will be checked there, and provided with a numbered label, the number of which will be handed over to the owner. Baggage will be retained in a special room to be fumigated. After disinfection, this will be marked on the articles concerned. Baggage is not to be returned to the fumigated rooms without this mark. Before leaving the rooms which are to be fumigated, all closets and cupboards are to be opened, so that the gas may easily enter, and so that the best possible effect is guaranteed. Closed closets will be opened by the camp leader, without

(page 11 of original)

any compensation for any damage resulting therefrom. The disinfecting barracks may only be entered after the vermin disinfecting department has released them for this purpose. Everyone is to comply strictly with these regulations. It is in everyone's own interest to do everything possible to facilitate the fight against vermin of all kinds. The plant and the camp management endeavour to make life in community camps bearable under present war conditions; every inmate is asked to do his share by observing discipline and regulations.

D.

Sketch

Sketches Trum.

CERTIFICATE OF TRANSLATION

6 April 1948

We hereby certify that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of the Document Book WURSTER IV.

Index I-XIII	Ephraim LEVIN Civ. No. D-153 535
Pages 1-14	Alice BLUM Civ. No. 155 89
Pages 15-20	Ther v. SEUFFERT Civ. No. B-397 929
Pages 29-43	Gunther WEISS Civ. No. 35 268
Pages 44-50	Rosa WEAVER Civ. No. 30 110
Pages 51-52b	Ephraim LEVIN Civ. No. D-153 535
Pages 53-54	Rosa WEAVER Civ. No. 30 110
Pages 65-68	Ephraim LEVIN Civ. No. D-153 535
Pages 89-102	Halcy LUND Civ. No. 30085
Pages 103-123	Alice BLUM Civ. No. 155 89
Pages 124-134	Johanna K. WEISBERG Civ. No. B-397 961

Case 6
Defense

TRIBUNAL VI

CASE VI

DOCUMENT BOOK V

FOR

Dr. CARL WURSTER

submitted by
the Defense Counsels

Attorney-at-law
Friedrich Wilhelm WAGNER

Attorney-at-law
Dr. Wolfgang HEINTZLER

Young



Index of Document Book V for Dr. Carl WURSTER Case VI

Doc. No.	Contents	Page
	Count III (cont'd)	
	<u>Allocation of Prisoners of War</u>	
195	Affidavit Pedrag VLAJIC of 10 January 1948. The witness was for the greater part of the year 1944 a Yugoslav prisoner of war in Camp V in the I.G. Farben plant Ludwigshafen-Oppau. After the collapse of Germany the prisoner has offered to make a statement in the interest of truth. He states that of all prisoner camps of which he knew Camp V was in every way the best one. He disproved the statement of the prosecution - Witness Marcel GRENOT in many points and states that great care was taken in the I.G. Farben plant Ludwigshafen-Oppau of the prisoners of war Camp V.	1-5
203	Affidavit of Hubert BERDEL, farmer, of 29 January 1948. The witness was employed as a guard in Work Detail 1000 B at the I.G. plant Ludwigshafen-Oppau from October 1942 to October 1944. He describes the excellent conditions in Camp V and the efforts made by the plant management for the sake of the welfare of the prisoners of war. He disproves the statement made by the prosecution witness GRENOT in many points.	6-12
217	Affidavit of Johann SCHOENUNG painter of 28 January 1948. The witness was from 1941 to March 1945 employed as a medical attendant with the work-detail 1000 b in Camp V of the I.G. Farben plant in Ludwigshafen-Oppau. He confirms reports on good living-conditions of the prisoners of war who were interned there and the efforts made by the plant-management for the welfare of these prisoners of war. This witness too disproves the statements of prosecution witness Marcel GRENOT in many points.	13-20

Doc. No.	Contents	Page
219	Affidavit Eugen SCHORHAUSER of 29 October 1947. The witness is a raster craftsman in the electrotechnical workshop in Oppau, in which the prisoner of war GRENOT was employed in 1944. He confirms that the prisoners of war worked the same hours as other workers, that they started work at 7.15 or 7.30 in the morning and left the premises at 7 or 7.15, after they had washed. The prisoners of war were never guarded by armed guards while at work. They worked in a work detail together with other workers.	21-23
159	Affidavit Theobald NEUNZLING of 28 October 1947. Since 1922 witness has been working as an assistant mechanic in the electrotechnical workshop in Oppau in which the French prisoner of war GRENOT was employed. This witness too confirms that the prisoners of war normally worked from 7.15 to 17.15 and did not work overtime. The witness also makes some other statements about the decent living-conditions of the prisoners of war.	24 - 27
216	Affidavit of Richard KLOHR of 29 November 1947. The witness has been working as an assistant raster craftsman in the electrotechnical workshop in Oppau since 1940 and remembers the French prisoner of war Marcel GRENOT who worked under him. He confirms that the statements of the other witness about the working hours of the prisoners of war are correct and also makes a statement about the decent treatment of the prisoners of war.	28 -29
544	Letter sent by the "Defense Center" to Dr. HEINTZLER of 26 November 1947 in which it is stated that it is impossible for a German civilian to get an entry permit into France and to exchange German Marks into French francs. (This letter explains the restrictions imposed on the defense for submitting adequate documentary evidence by procuring such material abroad).	30

Doc. No.	Contents	Page
542	General survey map of the district of Ludwigshafen/Rhine certified by the Oberbürgermeister on 16 December 1947, scale 1:10 000. The map shows that the distance from Camp V to the bunker of the "Reichautobahn"-Bridge was not, as stated by the prosecution-witness GRENDT, 14 km there and back; the distance from the camp to the bridge was no more than 2½ km.	31
552	Certificate by the medical officer of the State - health office Ludwigshafen of 21 January 1948, according to which the municipal hospital Ludwigshafen was exclusively responsible for the medical care of the prisoners of war.	32
551	Correspondence between the Badische Anilin & Sodafabrik in Ludwigshafen and the municipal hospital Ludwigshafen dated 5 to 24 December 1947, which proves that the case mentioned by the prosecution witness Marcel GRENDT is not known in the municipal hospital, according to which a French prisoner of war who was shot at the end of 1944 by the plant guard while stealing potatoes and was taken to the hospital Ludwigshafen where he was then alleged to have died.	33 - 36
256	Affidavit of Dr. Fritz MUELLER of 6 February 1948. In 1944 witness was the leader of the plant guard of the plant Ludwigshafen/Oppau. The cases mentioned by the prosecution witness Marcel GRENDT of Frenchmen who were shot at by plant guards, and of a Russian shot at by the plant guard are completely unknown to the witness. All inquiries about these incidents have failed to bring any results.	37 - 38
230	Affidavit of 30 January 1948 made by Wilhelm DANIEL, since 1929 safety engineer attached to the Oppau-part of the plant, and Dipl. Ing. Franz STEINHART, since 1938 safety engineer of the Ludwigshafen-branch plant. The witnesses state that all accidents which happened to prisoners of war during the war had to be reported on special forms, and that the safety engineers invariably received a copy of these forms. An example of such a form, concerning a French prisoner of war who had had an accident is attached.	

Doc. No.	Contents	Page
	The undersigned do not know anything at all about a French prisoner of war, in 1944, having been shot at and fatally wounded by the plant guards when they caught him stealing potatoes.	39 - 48
257	Affidavit made on 6 February 1948 by Josef MAIR, chief of the factory accounting office Ludwigshafen and Dr. Fritz MUELLER, who was chief factory-air-raid-warden in Ludwigshafen-Oppeu during the war, concerning the statement made by the witness GRENOT that before 26 July 1944 hardly any damage had been done to the Ludwigshafen plant by air-raids. The witnesses state that up to that date 34 air-raids had already been made on the plant causing damage amounting to approximately 90 000 000 RM .	49 - 50
249	Affidavit by the Czech foreign laborer Johann LATZKO of 8 January 1948. In 1943 the witness was entrusted with the supervision of the kitchens in the prisoner-of-war Camp next to the I.G. Farben plant Ludwigshafen-Oppeu. He ordered the necessary food-supplies and supervised the distribution of the rations. "Kitchen equipment and rations of the prisoners of war was good". Witness makes also other statements about the welfare arrangements made by the plant Ludwigshafen for the prisoners-of-war.	51 - 54
12	Menus issued on 29 August 1944 by the Storage and Supply department of the I.G. Farben plant Ludwigshafen for the prisoners-of-war covering the week from 3 to 9 September 1944.	55 - 56
541	Letter dated 28 June 1940 from the personnel department of the I.G. Farben plant Ludwigshafen-Oppeu addressed to Lt. SPECHT chief of the guards of the prisoners-of-war allocated to the I.G. Farben plant Ludwigshafen-Oppeu. The letter contains implementation-regulations issued for the purpose of enabling prisoners-of-war to have one bath per week.	57
545	Circular letter dated 1 November 1941 from the personnel department Ludwigshafen concerning payment of prisoners of war. In this letter possibilities are pointed out which would according to the existing regulations make possible better payment of the prisoners of war. It is urged that the greatest possible use be made of these possibilities.	58 - 59

Doc. No.	Contents	Page
123	Affidavit made by Oskar HERMANN on 33 September 1947. During the war the witness was chief of the pay-office of the I.G. Farben plant Ludwigshafen. He was also responsible for the settlement of accounts with the Wehrmacht about payment of the prisoners-of-war. He states that Dr. WURSTER had repeatedly sent him to the Stalag (PoW Camp) for the purpose of insuring higher net payment to the prisoners-of-war.	60 - 61
233	Affidavit made by Otto ECKERT on 29 January 1948. The witness has been the chief of the workers personnel department in the Ludwigshafen-Oppeu plant, since 1939. He states that the foreign workers and prisoners-of-war were during the war, supposed to work the same hours as German workers employed on the same type of job.	62 - 63
229	Affidavit made by Dr. Hermann KETTERER on 30 January 1948. Being the director of the Gerling-concern, witness is an expert in insurance matters. He states that the plants of the chemical industry could, from the point of view of inflammability and danger of explosion, not be considered high hazard plants, compared with other branches of industry.	64
228	Affidavit made by Julius EITH on 26 January 1948. Witness is deputy manager of the State-controlled accident insurance of chemical industry. He confirms that the plant Ludwigshafen-Oppeu cannot be called a hazardous plant.	65 - 66
189	Affidavit made by Karl TRAUTWEIN minister on 20 November 1947. Witness states that in summer 1943 Dr. WURSTER asked him for Church support in order to establish Church services for French and Polish prisoners in Camp V	67

Doc. No.	Contents	Page
242	Affidavit made by Dr. Fritz MUELLER on 16 January 1948. Witness was chief air raid warden in the I.G. Farben plant in Ludwigshafen-Oppeu and states how, in September 1944, upon the initiative of Dr. WURSTER, an American airman who had baled out, had been correctly and helpfully treated although, at that time, propaganda was already heading in another direction. He also mentions the helpfulness with which two wounded Americans were treated in the plant in March 1945, before the occupation of Ludwigshafen.	68 - 69
212	Letter of the former Polish prisoner of war MIECZYSLAW M. KOLASA sent from Poland to the Ludwigshafen plant in which he asks for a certificate about his employment in the electrical plant from March 1942 to March 1945.	70 - 71
210	Affidavit made by Anton JESBERGER on 6 January 1948. Witness has been a master-craftsman in the electrical plant of the main laboratory Ludwigshafen since 1941. He states that because of his extraordinary efficiency he had gone as far as making the Polish prisoner of war Kolasa a group leader of a work detail consisting of 4 - 6 men.	72-73

Doc. No.	Contents	Page
242	Affidavit made by Dr. Fritz MUELLER on 16 January 1948. Witness was chief air raid warden in the I.G. Farben plant in Ludwigshafen-Opau and states how, in September 1944, upon the initiative of Dr. WURSTER, an American airman who had baled out, had been correctly and helpfully treated although, at that time, propaganda was already heading in another direction. He also mentions the helpfulness with which two wounded Americans were treated in the plant in March 1945, before the occupation of Ludwigshafen.	68 - 69
212	Letter of the former Polish prisoner of war MIECZYSLAV M. KOLASA sent from Poland to the Ludwigshafen plant in which he asks for a certificate about his employment in the electrical plant from March 1942 to March 1945.	70 - 71
210	Affidavit made by Anton JESBERGER on 6 January 1948. Witness has been a master-craftsman in the electrical plant of the main laboratory Ludwigshafen since 1941. He states that because of his extraordinary efficiency he had gone as far as making the Polish prisoner of war Kolas a group leader of a work detail consisting of 4 - 6 men.	72-73

It is herewith certified that the
above is a verbatim and true copy
of the documents contained in this
document book.

Dr. Wolfgang HEINTZLER
Attorney - at - Law.

Copy.

A f f i d a v i t.

I, the undersigned, Vlado F r e d a g , born 12 January 1920, in Slavonske-Pozoga (Slovenia, Yugoslavia), residing in Frankenthal/Pfalz, Ruedorfstr. 4, Villa Janson, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nuernberg, Germany, for Case VI.

1. I am a Yugoslavian citizen and a medical student. At present I am working with the French Security Police (Surete National Francaise) as an investigator. During the war I fought on the side of the allies and was taken prisoner by the Germans in 1941. As a prisoner of war I was accommodated in many camps and was assigned to various work details. For example, I was in Staling Tier, Forbach, Saarburg. At the beginning of 1944 I was taken as a prisoner of war to Camp 1000-B, which was designated as Camp V of the I.G. Farbenindustrie A.G., Ludwigshafen-Oppau Plant. I remained in this camp until about the end of 1944.

2. From my experiences in Camp V of I.G. Farbenindustrie A.G., Ludwigshafen-Oppau Plant, I can state that of all the prisoner camps with which I was acquainted this camp was the best in every respect. In the camp there was a special barracks which was equipped with showers and bath tubs, of which the camp inmates could make regular use.

- 2 -

Day and night we had hot and cold running water. I could take a hot bath at any time, and I remember having done this one night at two o'clock following an air raid. The barracks could be easily aired out, and they were never overcrowded; they were equipped with steam heating. In addition, there was also a modern sanitary kitchen in the camp. Following air raids the administration of I.G. Farbenindustrie A.G. immediately set to work in each case in repairing the damaged barracks and supplying new accommodations as quickly as possible for the camp inmates who found themselves without living quarters.

3. I worked as a medical technician in the camp dispensary. This was very adequately and well equipped. It received all the necessary medicines and instruments, something which I never experienced anywhere else, even with the German Wehrmacht.

4. Feeding of the camp inmates was handled by the Storage and Supply Department of the I.G. Farbenindustrie A.G. The food was sufficient, varied and nutritious. The meals were always served exactly according to the dietary schedule as far as quantity and kind of food were concerned. I was informed that the witness Granot had made the statement that it was true there was a dietary schedule but that actually camp inmates did not receive the food listed on this schedule. In contrast to this I can state that this is not true but, as I stated above, that the meals served were actually identical to those listed on the schedule.

- 2 -

- 3 -

I want to call particular attention to the fact that we seldom had beets, I would have noticed that particularly because I cannot eat beets at all; I received beets in other camps but always refused them.

5. The treatment of my comrades in the camp, as well as at the place of work, was always good and never gave cause for any complaint.

6. During the period that I was in the camp we had many heavy air raids. These air raids also destroyed a part of the camp. I have already given some information under Section 2 as to the repair work which was undertaken immediately in the camp in this respect. In addition to these efforts to repair this damage immediately, measures were also taken in the interests of the camp inmates, which can be characterized as exemplary. I know that following an air raid the Polish Senior Camp had sent a letter of gratitude to the camp management for the welfare measures accorded the inmates at the time of one of these air raids. I recall that at the time of the heaviest air raid, even before the warning had been given and even while the attacking planes were still in the air, the German ambulance and medical corps, doctors and administrative officials of the Supply and Storage Department of the I.G. Farbenindustrie A.G. already appeared in the camp in order to render first aid to the wounded.

7. What the I.G. Farbenindustrie A.G. Ludwigshafen-Opau Plant did for the inmates of the camp was exemplary in every respect.

- 3 -

- 4 -

8. During air raids we prisoners of war at Camp V had an opportunity from that period on when the air raids became more frequent and more dangerous, to seek shelter, sometimes without supervision, in one of the two plant air raid shelters located within close proximity or in the shelters that were in the tote-de-pont of the Reich autobahn bridge near Frankenthal, which was located about one and a half kilometers away. German civilians sought shelter at the same time in the bunkers as well as in the shelters of the tote-de-pont. The shelters were located one behind the other in the interior of the tote-de-pont. These were generally regarded as being more bombproof than the bunkers and staying in them was considerably more pleasant than in a bunker during these attacks which lasted many hours. In one of these rooms we had equipped a ward for persons who were slightly ill. I myself remained in this ward as a medic for several weeks, and the food for myself and the invalids was brought to us there. We had hardly any supervision. When there were no air raids we used to lie out on the grass during the warm season near the Rhine in bathing trunks and sun ourselves. I as well as the others who were accommodated in these shelters felt quite satisfied.

9. I know nothing of the fact that a French prisoner of war had been shot at by the German guards. If such a case had occurred, I certainly would have learned about it since I had a great deal to do with the French prisoners of war because of my knowledge of French.

- 4 -

- 5 -

10. In January 1946 when I heard that charges had been made against people of the I.G. Farbenindustrie A.G. Ludwigshafen-Oppau Plant because of the accommodation and treatment of foreign workers in Germany, I got in touch on my own initiative and of my own volition with Herr Dr. Albrecht Meise in Heidelberg, whose address I acquired through inquiry, in order to submit an affidavit to him which in essence agrees with that which I have stated above. I did this in the interest of truth.

Frankenthal, 10 January 1948.

signed: Wladis Prodnig

The above signature of Herr Wladis Prodnig, affixed before me, F.J. Wegner, Attorney-at-Law, Ludwigshafen/Rhine, Schiesshausstrasse 32, is herewith certified and attested to.

Ludwigshafen/Rhine, 10 January 1948

signed: F.J. Wegner
Attorney-at-Law.

- 5 -

C o p y :

A F F I L - V I T .

I, the undersigned, Hubert P e r d o l , farmer, born on 10 November 1919 in Jockgrim, residing in Jockgrim, Ludwigstr.16, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Naumburg, Germany, for Case 6.

1. On 2 December 1940¹ I was drafted into the Wehrmacht and was first assigned to an infantry unit; I was wounded in Russia and, because I was no longer fit for front-line duty, was sent on 20 October 1942 to Stalag XII-f, Forbach; shortly there after, I was assigned from there to Kommando (work detail) 1000-b in Ludwigshafen and remained there until 20 October 1944. The prisoners of war of Kommando 1000-b were predominately assigned for work in the I.G. Ludwigshafen-Opau Plant. The camp in which Kommando 1000-b was accommodated was first located in the so-called Camp I on Rottstueckerweg, later farther north in the so-called Camp V.

2. The prisoner of war camp was under the command of the Wehrmacht; civilians and also members of the I.G. Plant as well, could enter the camp only with the special approval of the Camp Commandant.

3. In Kommando 1000-b I had to conduct the departing groups of sick prisoners of war and the incoming groups of new prisoners of war.

Later I acted as a sort of guard and had to supervise the departing and incoming groups going in and out of the camp. Each morning when the prisoners of war were marched out for their work I had to supervise and count these groups, and I did the same thing in the evening when the prisoners of war returned from work. Consequently, I observed almost daily in what condition the prisoners of war returned from their work in the I.G. Plant. During the whole time when I had this guard duty, that was about a year, I did not notice on any single time that the prisoners of war returning from their work in the I.G. Plant ever bore any kind of marks of mistreatment. If a witness testified before the Military Tribunal in Nurnberg that "no day passed that his comrades did not return in the evening bearing marks on their face and bodies of indicating that they had been beaten and kicked during the course of the day", and further, when he remarks about "their black eyes and smashed-in noses" then I can only say that this is not true; for if this were true, I would have noticed this in all events, in my job as guard, when I had daily to count the numbers of returning prisoners of war. In the entire two years that I belonged to Kommando 1000-b I could only observe that the I.G. Plant treated the prisoners of war who were employed there in a correct manner.

4. During the entire period of time I was a member of Kommando 1000-b I never learned

that a French, Russian or any other prisoner of war had ever been shot at in the I.G. Plant; such an incident would have certainly caused so much commotion and stirred up so much agitation that I certainly in all events would have learned about it.

5. The camp which the I.G. had to make available in each case for the accommodation of the prisoners of war was faultlessly equipped and differed in no way from the camps in which the free foreign workers of the I.G. were accommodated. The camp was very spacious, the billets were extremely well equipped. Each room had an electric light and a stove which was quite efficient in wintertime.

6. During air raids, up to July 1944, the prisoners of war were not permitted by the Camp Kommandantur to leave the camp; moreover, the prisoners had to seek shelter in the well-constructed slit-trenches in the camp. When in July 1944, after a single floating aerial mine had caused considerable damage ^{in the} ~~in the~~ plant, the guards were ordered by the Camp Kommandant to open up the gates of the camp even at the time of the first alarm to permit the prisoners of war to seek shelter without supervision either in the air raid shelters of the I.G. Plant or the special bomb-proof shelters located in the tate-de-pont of the Reichs Autobahn bridge, whichever they chose. At most, the distance from the camp to the Reichs Autobahn bridge was two kilometers; the tunnel-shelters located there were also particularly popular with the civilian population because they were considered especially safe. When later the air raids became more frequent and severe,

the CampCommandant, at the request of the majority of the prisoners of war, ordered that every evening the inmates of the camp should seek shelter, even if no alarm had been given, in the shelters located in the Autobahn bridge and stay there all night; adequate arrangements had been made for sleeping. I likewise went there every evening because I felt especially safe there.

7. As guard of Kommando 1000-b I can supply rather precise information about the working hours of the prisoners of war. Prisoners of war left the camp in the morning between six and eight o'clock; toward six o'clock there remained only a small number of the prisoners, namely, those who worked on the swing shifts. The majority of the prisoners of war left the camp between seven and eight o'clock; in the evening they returned between 1600 and 1730 hours. At 1600 hours only scattered numbers returned, the majority returning between 1700 and 1730 hours. Thus it is completely out of the question that prisoners of war worked, as a rule, twelve hours per day in the I.G. Plant, neither did I have the impression that the prisoners of war returned to the camp in the evening from the I.G. Plant in a state of over-exhaustion.

8. In general I had nothing to do with the feeding of the prisoners of war and therefore cannot state too much about this factor. However, a few times I did see the food which the prisoners of war received and even ate the same meal which the prisoners of war were served, a couple of times; on these occasions the food appeared sufficient and satisfying. It is out of the question

that the prisoners of war of Kommando 1000-b were undernourished. On the contrary, I recall quite clearly that a transport of Russian prisoners of war arrived in the camp in a very bad state of undernourishment. These Russian prisoners of war recovered quite rapidly in Ludwigshafen, gained weight, and after a few weeks looked quite healthy.

9. In general the clothing of the prisoners of war, which was a Wehrmacht matter, was good. Some prisoners of war were even rather conspicuous because they were wearing newly pressed trousers. These prisoners of war working in the I.G. Plant whose work was quite dirty and whose clothing wore out quite easily as a result, ^{received} like the other workers of the I.G. Plant, special work clothes from the I.G.

10. The sanitary conditions in the plant were very good. Washing facilities were sufficient. In the summertime the prisoners of war were able to use the tanks containing water for air raid emergencies as a swimming pool, and they made frequent use of this. The decontamination barracks there were supplied with showers; from time to time the prisoners were decontaminated there. When it was discovered that a barracks was contaminated with vermin, I.G.'s own decontamination squad took care of this decontamination work.

Medical care was handled in a well-equipped ward; this was in itself a matter of the Wehrmacht and was carried out predominately by prisoners of war who were physicians. In the case of wounds or accidents which took place at work, the prisoners of war were accorded medical treatment by the I.G. just as were other workers.

of I.G. In addition, the I.G. made available to the camp their special physicians and special medical facilities; for example, x-ray examinations. I myself often picked up medicine at I.G. for the ward. Once, upon the initiative of I.G., all camp inmates were subjected to an x-ray examination. As a result, quite a large number of prisoners were released and sent home on the basis of the x-ray findings. I brought three released prisoners to Forbach myself. When in July 1944 the floating aerial mine which I mentioned landed in the camp, the I.G. Plant, even during the alarm, put ambulances and trucks, as well as physicians, at the disposal of the camp for first aid measures.

11. The I.G. Plant also did a great deal for the prisoners of war in the field of recreation. For example, the I.G. Plant made available a large amount of sporting equipment. Also, through negotiations with the Plant Commandant, the I.G. made it possible for the camp football team to play against other teams on the fields located outside the camp; at these games the prisoners of war who came as spectators also met other spectators and were able to converse with them. I recall, further, one time that I.G. made possible the participation of a large number of camp inmates in a large, international vaudeville performance in Mannheim and arranged a special performance for the prisoners of war, to which they were brought in street cars which had been chartered for this purpose. In the camp itself there were concerts and theatrical performances.

for the prisoners of war, in which they themselves took part.
.. suitable hall with a stage in the camp was provided for this purpose.

12. The I.G. Plant did a great deal for the prisoners of war in general. It often happened that additional food rations which the prisoners of war had received from the I.G. Plant were taken away from them by order of the Camp Commander's Office. Thereupon the I.G. Plant lodged a complaint with the Camp Commander's Office and pointed out that these prisoners of war were good workers to whom one ought to grant these concessions.

Jockgrim, 29 January 1948

signed: Hubert Bardol

The above signature of Herr Hubert B a r d o l , affixed before me, Dr. Wolfgang Beinstadler, Ludwigshafen/Alimo, Brunckstr. 13, is herewith certified and attested to.

Jockgrim, 29 January 1948

signed: Dr. Wolfgang Beinstadler
Attorney-at-Law.

Page 13 of original

COPY

A F F I D A V I T

I, the undersigned Master painter Johann Schoenung, born on 7 March 1912, at Lindenberg/Pfalz, at present residing in Pussgoenheim/Pfalz, Spoyerer Strasse 14, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice in Nuernberg, Germany for Case VI.

1. On 21 May 1940, I was drafted into the Wehrmacht and my first assignment was with a motorized infantry unit. As I am suffering from a kidney complaint, I was transferred in January 1941 to the POW camp Stalag 12B at Ludwigshafen on the Rhine. In March 1944 I was assigned to work detail 1000 B, which at first was located in camp I, and later on in camp V, of the IG Plant at Ludwigshafen on the Rhine and the inmates of which were primarily committed for work at the Ludwigshafen Oppau IG Plant. At first I was a guard for a short period, and later on I was transferred to the medics. I stayed with work detail 1000 B until 16 March 1945. There, I was the medical corps first class private (Gefreiter) in charge of the dispensary. I was assisted in my work by medics who had been picked from the ranks of the prisoners of war, and by a POW physician.
2. The accommodation of the camp POWs assigned to detail 1000 B, which camp had to be made available to the Wehrmacht by the IG for this specific purpose,

Page 14 of original

2. was excellent. The camp had a spacious layout. The housing barracks with an average of approximately 10 to 12 men in one room were excellently equipped and had electric lighting. The bath barracks were equipped with modernistic bathtubs and showers, which the POWs could use day and night, and where they could have cold and hot showers. To all intents and purposes the POW billets were in no way different from the billets provided for other employees and workers of the I.G. Ludwigshafen, who lived in communal camps.
3. Each camp had its own dispensary consisting of one consulting room and three sick rooms. The sick people could use two bathtubs with running cold and hot water as well as XOs, which had been installed in the dispensary barracks. Surgical instruments and dressing material were almost exclusively supplied to the camp Wehrmacht administration by the IG, which fact made it possible that we were at all times exceedingly well supplied with those items. It was not until the latter part of 1944 that the dispensary was completely destroyed by an air raid, and it was at this period that the Army authorities took over dressing material and surgical instrument supplies for the camp.
4. The camp in which detail 1000 B was billeted was under the command of the Wehrmacht. Civilians including IG employees were only permitted to enter the camp with a pass issued by the camp commander. The IG management, especially the manager of the storage and supply department, ore, however, always endeavoring to support and assist the Wehrmacht camp administration

Page 15 of original

as best as they could, so that they could complete their tasks, and care for the welfare of the prisoners of war.

5. Health welfare activities for the POWs of detail 1000 B were initially in the hands of the Wehrmacht. However, in cases of accidents or emergency sick cases, the POWs, during working hours, were entitled to consult the IG's civilian physicians, who in such cases treated them like all other employees of the IG Plant. If it had become necessary to admit a POW into the dispensary or the hospital, the IG always sent their own ambulance, as the prisoner camp did not have its own ambulance, and the calling in of a Red Cross car from town usually took too much time.
6. During all the time from 1941 until 1945 I was able to observe that POWs while working in the IG plant were always treated correctly. There hasn't been one occasion where I could notice and conclude that a POW was treated badly in the IG plant, or even maltreated. In the dispensary I have never treated a POW who showed traces of maltreatment; also, I've never seen a POW in the camp who showed traces of such maltreatments. As I was the Private First Class medic in charge of the dispensary, I could not possibly have failed to discover traces of maltreatment on POWs, if they had been maltreated during their work in the IG Plant.

Page 16 of original

7. Neither do I know of any cases whereby a French POW was shot at in the latter half of 1944, which incident allegedly happened in the IG plant and the plant guards shot the POW nor that this particular POW later on died from his wounds. If it is an actual fact that the French POW was shot at in the IG plant, and having received treatment in the dispensary for several days, was then transferred to a hospital where he had died, I, as the Private First Class medic in charge of the dispensary could not have failed to notice this fact; besides, any such incident would have caused a virtual upheaval, and eventually the superior Wehrmacht authorities would have been informed, and then would have started an investigation of the case. I also have no knowledge of a case where a POW Russian was allegedly shot at in the IG plant.
8. As for the food supplies for the POWs, the rations were always fixed by the Government authorities setting down a standard ration. The kitchen of detail 1000 b was inside the camp, and the cooks were mostly taken from the ranks of POWs of all nationalities. The storage and supply department of the IG looked after purchasing of food for the camp, and they also endeavored to support and assist the camp kitchen in preparing a nutritious and palatable diet. Every week the storage and supply department of the IG issued a menu, which was forwarded to the main POW camp of the Wehrmacht where it was checked whether the prescribed caloric values were complied with. Afterwards, the menu

Page 17 of original

was returned, and I can remember that even in 1944 the daily caloric values were approximating 3000 units. I myself had been instructed to conduct daily food checks for its quality and nutritious value. Therefore, I can confirm from my own personal experience that the POWs actually received those items which were marked down on the menu issued by the storage and supply department. It simply is not true if a former POW of detail 1000 b testified as a witness: "In the morning we received a cup of coffee, if you want to call it that. For lunch we were given a soup. For supper we received one boiled potato and a slice of bread, in addition once or twice a week a tiny piece of meat which was hardly fit for human consumption; furthermore, we received carrots as many as we liked, just ordinary carrots (Steckrüben)." Even right up to the end food supplies for POWs of detail 1000 b were good and sufficient. I myself and my comrades of the Wehrmacht guard detail in the camp often said that we would prefer to exchange our Wehrmacht chow for POW food.

I wish to state that the Storage and Supply Department of the IG always endeavored to procure additional food supplies for the POW over and above the official rations especially on holidays, and in the majority of cases they were successful to supply some supplementary food for the POWs.

Page 18 of original

9. During the whole of the time ^I was with detail 1000 b I never noticed any signs of general undernourishment. In individual cases it did happen though that a POW, who simply could not stand the camp diet, suffered, from hunger edema, but all these POWs were then given a special diet as prescribed by a physician, which was specially cooked in the camp kitchen, with the result that the hunger edema disappeared altogether.

I recall that on one occasion the camp was inspected by a commission of the Geneva ^{Red} Cross; I myself was present in the office when the result of the inspection was discussed between Red Cross representatives and the camp commander. On that occasion the Red Cross representatives generally praised the camp.

10. Clothing and footwear supplied for the POW was in the hands of the Wehrmacht. Nevertheless, the Storage and Supply Department of the IG Plant frequently took it upon itself to assist in acquiring supplies. When on one occasion there was a shoe shortage in the camp, the Storage and Supply Department delivered 50 pairs of wooden shoes with leather uppers without charge, in order to meet immediate demands.
11. Until 26 July 1944 the POW main camp (Stalag) had issued an order prohibiting the leaving of the camp by POWs during air raids. Up to this time they were ordered to shelter in the concrete trenches of the camp just as the German soldiers who were in the POW camp.

Page 19 of original

For the first time on 26 July 1944, casualties occurred in the camp because of an air raid, which were caused by one single aerial floating mine, a specially heavy one, which hit the camp and killed many POWs. In this connection I would like to mention that the IG Plant assisted the camp as much as possible in order to alleviate the bad effects of this disaster; even before the all-clear was sounded several plant ambulances arrived following my phone call, and afterwards an additional number of trucks arrived in the camp from the Plant; shortly afterwards two factory physicians and other gentlemen of the plant management appeared on the scene in order to assist in the first aid measures.

Shortly after this event the camp commander gave permission that during air raid attacks the POWs could take shelter in the IG Plant shelters.

However, some of the POWs preferred to go into the especially bombproof tunnels of the autobahn bridge near Frankenthal, which were also used by the civilian population of the surrounding villages because of its special bombproof equipment, and which was widely used. In order to get to the autobahn bridge, the POWs had to walk for 20 to 25 minutes (approximately 2 kilometers); they went there without guard, and many of them made special arrangements, because of the increasing ferocity and frequency of the air raids, by simply going to the autobahn bridge every evening, sleeping there, and returning for work the following morning.

Page 20 of original

12. I know that the IG also did everything to entertain the POWs of detail 1000 b. Thus, the IG frequently showed movies to the POWs, and I also remember that the IG made available plant owned sporting grounds for the use of the POWs. The POWs themselves had organized an orchestra and an actor's groups. I am unable to furnish details in how far the IG supported the prisoners in their above mentioned activities.
Ludwigshafen on the Rhine, 28 January 1948.

Signed: Johann Schoenung

I herewith certify and attest that the above signature of Master Painter Johann Schoenung, residing at Fussgoenheim/Pfalz, Speyereistrasse 14. was affixed before me, Dr. Wolfgang Heintzeler of Ludwigshafen on the Rhine Brunckstrasse 13.

Ludwigshafen on the Rhine, 28 January
1948.

Signed Dr. Wolfgang Heintzeler, Lawyer

Page 21 of original

COPY

A F F I D . . V I T

I, Eugene Schornhaeuser, born 22 May 1891 at Ludwigshafen on the Rhine, at present residing at Ludwigshafen on the Rhine ; Koernerstrasse 18, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice, Nuernberg, Germany.

I'm an electrician by profession, and since 5 February 1917 I have been working with the IG Farbenindustrie Aktie gesellschaft, Ludwigshafen on the Rhine, in the Oppau Electrical Plant. Since 1944, I have been a master electrician in the Oppau electrical plant. During the war civilian foreign workers and prisoners of war worked in my plant, replacing the German workers who had been drafted. These workers performed the same type of work as their German comrades. As all of them were electricians, they were only employed for special jobs; they did not do any especially heavy work.

I made entries in a labor allocation register about the civilian foreign workers and the prisoners of war, monthly allocation reports, and looking through this book I noticed that the POW Marcel Grenot, POW, No. 1/ 5317, had been allocated in the plant warehouse , 25 November 1944, for clearing up work after an air raid. On the checking date 25 December 1944 Grenot was sick also on the following checking dates:
25 January 1945, 25 February 1945 and 25 March 1945.

Page 22 of original

The daily working schedule was the same for everybody, with work starting at 0700 till ¹²⁰⁰ hours, and again from 12 hours till 1745 hours. On Saturdays the work schedule ran from 0700 hours until 1300 hours. Sunday was free, also for the POWs. In the majority of cases POWs did not start work in the morning between 07:15 and 07:30 hours, and left their places of work between 1700 and 1715 hours, after they had a wash before leaving off work. Washing facilities were within the workshop and accessible at all times, also to the POWs.

It repeatedly occurred after air raids- that the whole staff including the POWs - were detailed to do clearing up chores; however, this type of work was not particular heavy. During air raid attacks both POWs and foreign workers, like the Germans, were permitted to go into the plant air raid shelters.

During working time the POWs were never guarded by armed plant guards. They worked in one work detail together with other workers. A German worker who also worked in this detail was in charge of them. The plant did not send out special supervisors for POWs. The work detail was mostly employed somewhere in the Oppau plant, according to the jobs which had to be performed, or somewhere else if other plants had put in requests for electricians; this happened above all in the plants Op 590 and Op 767.

Page 23 of original

I have never received any complaints about too long
a working schedule or too heavy work, and did not receive
any such complaints from any of the French POWs either.

Ludwigshafen on the Rhine, 29 October 1947

Signed: Eugene Schornhaeuser

I hereby certify and attest that the above signature
of Eugene Schornhaeuser of Ludwigshafen on the Rhine,
Koernerstrasse 18, has been affixed before the Lawyer
Friedr. Wilh. Wagner, Ludwigshafen on the Rhine.

Ludwigshafen on the Rhine, 29 October 1947

Signed: F.W. Wagner

Copy

AFFIDAVIT.

I, Theobald SEURZLI G, residing at Ludwigshafen on the Rhine, Prinzregentenstr. 49, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before Military Tribunal at the Palace of Justice in Nuernberg, Germany.

I was born on 21 May 1895 in Muenchweiler/Leens, Germany, and since 2 November 1922 I have been working as an assistant fitter in the Oppau Electrical Plant of the Badischen Anilin - & Soda Factory.

During the war, apart from my usual job, it was my task to accompany the POWs in the morning from their camp to their place of work, and to return them to the camp in the evening. At first the POWs were billeted in Camp I which was Northwest of the camp in its immediate proximity. Later the prisoners were billeted in Camp V which was even closer to the plant in a northerly direction. During the whole period when I collected the POWs in their camp, I never noticed that there was a punitive detail working inside this particular camp. If individual POWs were doing special work inside the camp, this was attended to whenever the occasion arose, and it was not a matter of establishing a special detail for this purpose.

(page 2 of original)

I do not know that a POW of my group, which at first consisted of 40 to 50 men and later increased up to 100 men, had ever been detailed for any such special work. My group was considered the best one, and they were not looked upon as members of a punitive detail.

When collecting or returning the POWs I was not armed nor did I wear a uniform. I accompanied the prisoner group up to a point approximately in the center of the Oppau Plant, and from there representatives of the individual work shops collected them and/or returned them there in the evening.

Approximately 20 POWs were employed in my plant, and I took them there myself, assigning them to the various master craftsmen; one of these prisoners was the French POW Marcel Grandé, who was employed in our workshop from the middle of 1944 right up to the end of the year. These POWs were allocated for work according to their vocation and training. They were mostly employed right inside the workshop, and they were doing such jobs as are customary in electrical plants and to which they were assigned, exactly like the German workers.

As a rule they worked from approximately 0715 until 1715 hours; in principle, the POWs were not called upon to do overtime. The POWs in my group never worked 12 hours a day. Other POWs who had been assigned to change-over-shifts could work for 12 hours on one single day.

(Page 3 of original)

but then they were off duty for the following 24 hours. In such cases the average weekly working time amounted to 56 hours.

The POWs in my group were exclusively assigned to daytime work, because most of them were tradesmen, and they were not assigned to particularly heavy jobs. If any damage had been sustained due to air raid attacks, it did happen that the POWs, just like all the other employees, were assigned to clearing up chores which, however, could not be called particularly heavy work.

Judging by their general appearance I assumed that the food supplies for the POWs were neither bad or even insufficient. I never heard about a case of under-nourishment, or that a worker was incapable of work because of general exhaustion. Never did I hear that the POWs complained about their billets. Their barracks were clean, spacious, heated and equipped with running water.

Towards the end of 1944 when the air raids assumed increasingly larger proportions, the POW camp was also reportedly hit, so that it was unavoidable that hygienic conditions and general accommodation deteriorated.

If air raid attacks took place during working time the POWs, exactly like all other foreigners and the German employees, were permitted to use the air raid shelters and bunkers of the plant.

(page 4 of original)

I do not know what shelters were used by the POWs during night attacks.

The camp itself was provided with covered concrete slit trenches. Approximately one and a half to two kilometers away there was the bridgehead of the still building Reich autobahn bridge near Frankenthal, the tunnels of which provided adequate protection for a large number of people. Furthermore, in the immediate proximity of the camp there were plant shelters which could also be used by the POWs.

I was particularly interested in watching how the POWs were treated, as I was an opponent of the Nazi regime, and did not approve of the methods frequently used by our rulers.

Ludwigshafen on the Rhine, 28 October 1947

Signed: Theobald NEUZLING

I herewith certify and attest the above signature of Theobald NEUZLING of Ludwigshafen on the Rhine, Prinzregentenstr. 49, who identified himself by producing his identify card with his photograph, which has been affixed before Dr. Karl LOCKERMANN, Notary of Ludwigshafen on the Rhine.

Ludwigshafen on the Rhine, 28 October 1947

Signed: Dr. LOCKERMANN
Notary

Official Seal

Copy

AFFIDAVIT.

I, Richard LOHR, born 24 January 1897 at Gimmeldingen, at present residing in Fauststr. 11 D. Haardt Gatlenthausstrasse 17, have been duly warned that I render myself liable to punishment if I make a false affidavit.

I declare on oath that my statement is the full truth and that it has been made in order to be submitted

as evidence before the Military Tribunal at the Palace of Justice in Nuernberg, Germany.

I started employment with the I.G. Farbenindustrie Aktiengesellschaft, Ludwigshafen on the Rhine on 3 December 1918, and ever since I have been working in the Oppau Electrical Plant without interruption, starting 1 January 1940 as an Assistant Mastercraftsman. It was part of my duty to assign civilian foreigners and prisoners of war to work details, and to commit them in the individual plants and shops of the plant according to requirements. I remember that in the latter part of 1944 the French POW Marcel Grenet was assigned by me to one of these groups, whenever expedient. Such a group or detail consisted of two or four men. These were jointly at jobs to which they had been assigned.

There were no special guards. It never occurred that a prisoner of war was guarded by armed plant guards. However, there was a chance that if a work detail were close to the plant boundaries, occasional patrols of the plant guards passed them, without the intention on the part of the plant guard to supervise this particular work detail. As far as I can recollect Grenet was sick either as from the end of November

Document Book V WURSTER
Document No. 216

(page 2 of original)

or from the beginning of December 1944, and he was not assigned to work. During the period he worked with me he was assigned to the daytime shift.

Daily working hours were from 0700 to 1200 hours, and from 1245 to 1745 hours, on Saturdays from 0700 to 1300 hours. In principle, the prisoners of war did not work on Sundays. Furthermore, in the morning the POWs arrived a little later to start work, and left somewhat earlier in the evening.

I have never received complaints from POWs concerning unduly long work hours, or because they thought they were assigned to too heavy work. I do not know that any POWs in my group were ever maltreated by armed plant guards during working hours.

During daylight air raid attacks, the individual work details jointly took shelter in the nearest air raid shelters.

Ludwigshafen on the Rhine, 29 October 1947

Signed: Richard KLOHR

I hereby certify and attest the above signature of KLOHR, Richard, Heustadt a.D. H. rdt Gutleuthausstr. 17, which has been affixed before L. Wyrer Friedr. 11th. WAGNER of Ludwigshafen on the Rhine.

Ludwigshafen on the Rhine, 29 October 1947

Signed: F. W. WAGNER

Document Back V WURSTER
Document No. 544

OFFICE OF MILITARY GOVERNMENT (US)
SECRETARIAT FOR MILITARY TRIBUNALS
Nuremberg, Germany
APO 696

DEFENSE CENTER

26 November 1947

TO: Dr. HEINTZELER

AG has notified this office that it is not possible to obtain travel clearance to France for a German civilian, unless it is for a serious illness of a close relative in France.

There is no possible medium to exchange German Marks for French Francs.

signed: LOWELL O. RICE
Captain INF
Executive Officer

Document Book V MURSTE.
Document No. 542

Survey and Map of the Municipal District of Ludwigshafen on the Rhine, accompanied by the certification of the Oberbürgermeister, dated 16 December 1947.

Scale of map: 1 : 10,000

CONFIRMATION

Copy

Municipal Health Office, Ludwigshafen on the Rhine
Ludwigshafen on the Rhine
Ludwigshafen on the Rhine, 21 January 1948
Deerhorststrasse 36, Health
Office
Postal Checking Account No.
20004 Ludwigshafen on the Rhine
Telephone No. 62521

Register No. . . .

Medical Officer's Certificate

During the war only the city infirmary of Ludwigshafen on the Rhine was responsible for treating POWs. No POWs were treated in the hospital which had been installed by the I.G. Farbenindustrie A.G., but only foreign workers received medical treatment there. The hospital equipment was exemplary. There have never been any complaints concerning treatment, food, and accommodation.

Seal:

Municipal Health Office of the City of Ludwigshafen on the Rhine

Signed: Dr. HATZFELD
Senior Medical Officer
(O.D.C.R.t)

Page 33 of original

Municipal Infirmary
- Administration Office -
(22b) Ludwigshafen/Rhine

B. B December 1947/Sch.

Referring to the information given to the undersigned by your
Herr Klee on 4 December I ask you to be kind enough
to answer in writing the following questions:

1. Is it true that during the time of November 1944 until
December 1944 a French prisoner of war of the work de-
tail No. 1000 b of the I.G.Ludwigshafen/Rhine, died
in your hospital of a wound inflicted by a pistol shot
in the upper part of the hip?
2. Was a prisoner of war of that work unit, during the
period in question or even earlier ever placed in the
care of your hospital and did he die there?
3. Is it feasible that a patient died in your hospital
without such a fact being indicated in your journals?
4. Did you list all prisoners of war, who died in your
hospital, in your journals in the same manner as the
Germans who died there?

In case your answer to the first two questions should
be in the affirmative, then I would ask you to enclose
a certified copy of the original data with your answer.
I would like to mention that the information which you
will give in reply to this request may be used even-
tually in the trial at Quernberg against the Directors
of I.G.

Thanking you in advance for your efforts, we remain

Very truly yours

BADISCHER AMILIN & SOD. F. BRIK
Department for Social Welfare.

Page 34 of original

COPY

THE OBERBÜRGERMEISTER OF THE CITY OF LUDWIGSHAFEN/RHINE

Municipal Infirmary

Telephone: 621 11

Postal checking account
(Municipal Main Cashier's
Office)Office: Ludwigshafen/Rhine
No. 690To the
Badische Anilin & Soda-Fabrik
Department for Social
WelfareBank Account:
(Municipal Main Cashiers
Office)Municipal Savings Bank
Ludwigshafen/Rhine.LUDWIGSHAFEN/RHINEYour ref.No.: Your letter of 5 December 1947 Ludwigshafen/
Rhine

24 December 1947

Our ref.No.: Administration K1/Pl.

Subject: Inquiry concerning a deceased prisoner of war

In reply to your letter of 5 December 1947, we are able to answer your questions, as far as this is possible according to the available files and registers, in the following manner. As an essential factor it has to be taken into consideration that the entire files of sick-lists and sick-reports had to be submitted in the original, approximately 1½ years ago to the French Military Government (Service de Recherche). We have no copies of the sick-reports in our files.

Ad question 1: After a scrupulous examination of our files we find that a case like the one you mention is not entered in our registers for the period of November 1944 until December 1944

Page 35 of original

Ad question 2: During and prior to the time in question (covering a period of approximately four months) only one prisoner of French nationality of the work detail No. 1000 b was placed in our care and died at our hospital.

A copy of the admission file is attached to this letter.

Ad question 3: All patients who died in our hospital are named without exception in our registers.

Ad question 4: All prisoners of war who died in our hospitals were named in our files and registers in the same manner as the Germans who died there.

The Administration of the Infirmary
(signed) signature

Enclosure.

DOCUMENT BOOK V - JURSTER

DOCUMENT No. # 551

Enclosure to Document No. # 551

No. 9362

Name: Quentin Achille, Prisoner of War No. 52186Building: 23 I

Born on: 22 December 1909 in France, District.....

Class : 3

Occupation: Prisoner of War, Worker. Nationality: French

Religion:.....

Name of wife/husband: born on:.. Occupation:.. Family Stat.

Name of father:.. Born on :... Occupation:.....

Parents:

Name of mother:..... Residence:.....

Employer of the sick person: I.G. Farben, Ludwigshafen.

Place of work:

Employer of the wife/husband or father.... Place of work:

Place of Residence : I.G. Farben Camp, Work detail No. 1000 bStreet:..... c/o.....

Father of the illegitimate child..... Occupation... Residence

Annuity..... Pension..... Welfare Subsidy Recipient.....Amount:.....Hospitalizing physician:

Ambulance Service Ludwigshafen

Delivered by:

: Plant accident...

Diagnosis for hospitalization: Injury of the

Traffic accident.

Kind of injury

right eye, caused

Occupational

disease:.....

by war effects,

Costs payable by:

Stammlager XII at present located at
Freinsheim

Acknowledged until

.....

.....

Day of admittance: 27 September 1944

Day of discharge:

Time:.....

15 October 1944,

13:45 hours

Page 36 of original cont'd

Notice of Admission:.....	Cured, not cured,
Reminded on:	transferred for further
Cause of death: Brain concussion treatment, not able to	work,
Emboly of the lungsdays rest after
	observation according to
	medical advice, for dis-
	ciplinary action.
	Future residence:.....

Page 37 of original

COPY

A f f i d a v i t

I, the undersigned Dr. Fritz M u e l l e r, born on 1 March 1892 at Weising /Saxony, residing at Ludwigshafen /Rhine Jochlerstrasse 6, chemist, since 1920 employed by the Badische Anilin- & Soda-Fabrik, Ludwigshafen/Rhine, since 1938 Chief of the Department plant guards, have been duly warned that I make myself liable to punishment by making a false affidavit. I declare that my affidavit is true and have been informed that it is to be presented in evidence for case 6 at the American Military Tribunal at the Palace of Justice at Nuernberg, Germany.

I have been informed that a witness testified before the Military Tribunal No. 6 at Nuernberg, that at the I.G. Plant Ludwigshafen-Opau,

- a) approximately in November 1944 a French prisoner of war, when taking some potatoes from a potato freight car, was shot at by the plant guards and died a few days later from the bullet wound at the infirmary Ludwigshafen,
- b) that in the second half of 1944, a Russian was shot at by the plant guards without warning and was shot through one hand and both legs when he tried, lying on the ground, to steal some liquid from a tank car.

I declare herewith that I have absolutely no knowledge of these two events; I declare further, that these two events according to the organizational set up of the plant guards

Page 38 of original

under my command, without any doubt would have been reported to me if they had actually occurred. Finally I declare that according to the data available to me, from talks with former plant guards as far as I could reach them and from consultations with colleagues, no actual proof could be furnished which would substantiate the fact that such events actually took place, since the time after 1944 until today.

Ludwigshafen/Rhine, 6 February 1948
(signed) Dr. Fritz Mueller

The above signature of Dr. Fritz Mueller, affixed before me Dr. Wolfgang Heintzeler, Ludwigshafen/Rhine Brunckstrasse 13, is herewith certified and confirmed by me.

Ludwigshafen/Rhine, 6 February 1948
(signed) Dr. Wolfgang Heintzeler
(Attorney-at-Law)

COPY

AFFIDAVIT.

We, the undersigned,

- a) Dipl.Ing. Wilhelm DANIEL, born 26 December 1897,
residing in Ludwigshafen/Rhine, Schwalbenweg 31,
- b) Dipl.Ing. Franz STEINHART, born 11 November 1901,
residing in Ludwigshafen/Rhine, Hardtstr. 24,

having been duly warned that we make ourselves liable to punishment if we make a false affidavit, declare under oath that our statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice, Nuremberg, for Case VI.

- 1.) I, the undersigned, Dipl. Ing. Franz STEINHART, have been employed since July 1929 with the I.G. Plant Ludwigshafen-Oppeu and from 1938 to the present day in the full-time position of safety engineer for the branch plant at Ludwigshafen.

I, the undersigned, Dipl. Ing. Wilhelm DANIEL, have been employed since October 1927 in the I.G. Plant Ludwigshafen/Rhine-Oppeu and, since October 1933 up until the present day have held a full-time position as safety engineer at the branch plant Oppeu.

The safety engineers are the representatives of the plant management in charge of supervising all safety devices and safety measures in the plant, for the prevention of accidents as well as for the investigation of accidents and for the disposition of all accident matters through administrative channels.

Among other things the safety engineers are responsible for keeping in touch with the competent Reich Accident Insurance Company;

(page 2 of original)

for the plant Ludwigshafen-Oppau this is the "Professional Association for the Chemical Industry, Section VI, in Mannheim."

- 2.) During the war the foreign workers and prisoners of war employed in the Ludwigshafen-Oppau Plant were insured against plant accidents just as every other German worker, with the above-mentioned Professional Association. If a foreign worker or a P.O.W. suffered an accident on the plant site, then we had to report this fact as in the cases of German workers, on a prescribed form of the Association in each case the safety engineer received a copy of the report. To illustrate this procedure we enclose with this affidavit the accident report dated 20 September 1943 of the Prisoner of War, Rene Achoin. A report of this type was issued on general principles if a foreign worker or a prisoner of war became temporarily disabled or was fatally injured as a result of an accident suffered on the plant site.
 - 3.) Nothing in the least was known to the undersigned that in the latter half of the year 1944 a French prisoner of war in the branch plant Oppau had been shot at while he was on top of a freight car used for transporting potatoes and died several days later in a hospital in Ludwigshafen. There is no doubt that if such an accident had happened that we would have been informed of this through an accident report such as the one enclosed. Therefore, we consider it inconceivable that such an accident actually took place.
- Ludwigshafen/Rhine, 30 January 1948.

Signed: Wilhelm DANIEL
Signed: Dipl. Ing. Franz STEINLEIT

(page 3 of original)

The above signatures of Dipl. Ing. Wilhelm
DIEHL and Dipl. Ing. Franz S. EINHART, affixed
before me, Dr. Wolfgang REINTZLER, Ludwigshafen/
Rhine, Bruckstr. 13, are herewith certified and
attested to.

Ludwigshafen/Rhine, 30 January 1948

Signed: Dr. Wolfgang REINTZLER
Attorney-at-Law

Enclosure.

COPY

Enclosure.

To the Professional Association for the Chemical Industry,
Section VI, Mannheim.

Sender (Entrepreneur): I.G. FARBER INDUSTRIES KTH G. SELL-
SCHLIFT

LUDWIGSEAFEN/RHINE

Membership Card No. 60 142
Membership Card No. 60 027

Accident Report.

1. This accident report shall be submitted only for fatal accidents and accidents which presumably result in work disability lasting longer than three days (complete or partial disability). Such accidents shall be considered vocational accidents which occur on the way to and from the work and apprentice shops in the course of carrying out a job connected with the plant; further, accidents which occur in the course of executing a job connected with the plant in storing, transporting, maintaining, and replacing machinery or tools. A special accident report is to be filled out for every person injured or fatally injured.

2. The report is to be submitted:

- a) in all cases in duplicate to the Accident Insurance Company (for example, Professional Association or its section or district administration office),
- (b) in the event the enterprise is a member of a Professional Association

In ad- (the general Accident Insurance Company: one copy to
dition (the Industrial Relations Office (or the subordinate
(mining authorities) in so far as it (they) is (are)
(competent,

- (c) should the injured person die as a result of the
(accident: one copy to the local police authorities
(of the city where accident occurred.

3. The accident report is to be submitted by the entrepreneur or his representative within three days, otherwise a fine shall be imposed (Article 1556 of the Reich Insurance Code).

4. Fatal cases, other severe accidents, and group accidents shall, in addition, be immediately reported to the competent Professional Association by telephone or telegraph.

Document Book V 'URSTLER
Document No. 230

(Page 2 of original)

5. A special form (green) shall be used in cases
of occupational diseases.

1. a) Day, Date, Year, Tuesday, 7 September 1943
 Time of accident 9:10
 b) Time when Worker
 Began Work on Day of accident
 c) Accidents on the Way to
 the Workshop; End of the
 Working Period of the
 Injured Person on Day of accident.
2. a) Type of Enterprise (e.g., c) Chemical Factory.
 Machine Factory; Iron Ludwigshafen Plant.
 Foundry, Office, Household
 b) In what part of the enterprise b) Communications
 (e.g., tool shop, cleaning Department,
 shop, household, sales Transportation
 store) is the wounded person Business Lu.
 constantly employed?
 c) Part of the enterprise or c) Building Lu. 305
 (land) town (street and house number)
 where accident occurred

(page 3 of original)

3. a) First and Last Name, City and Residence of the Injured Person c) Rene ACHAIN
Ludwigshafen/Rhine
PW Camp
- b) Minors, Under Age or Persons Under guardianship: b)
First and Last Name, City and Residence of the (Father, Mother, or Guardian) or Foster Parents
- c) Profession c)
- d) Employed in the Plant-as d) French PW
(Nature of Employment, Location)
- e) Day, Month, Year, and Place of Birth e) 7 September 1917
- f) Citizenship f) French
- g) Single, Married, Widowed, Divorced? g)
Number of Children (excepting Step Children and Foster Children) under 18 years of age
Children Under 18
Years of Age.....
4. a) Is the Injured Dead? a) No
- b) I. What Part of the Body Injured? (Exact Data, e.g. Upper Right Arm) b) I. Left Foot
- II. Type of Injury II. Contusions
(Loss of Limb, Broken Bones, With or Without Open Wounds, Dislocations, Sprains, Etc., Etc.)

(page 4 of original)

- g) Did the Injured Person Leave His Work Immediately? c) Immediately? Yes 9:10 Or When? If.... o'clock
- d) Did the Injured Take up His Work in the Machine and If So, When?

(Remarks of 4 lb.) to d)

If possible, according to the sick certificate or information from the physician.

Remark on left margin:

The regular and timely report of accidents is in the interests of the injured person. The sooner the Professional Association receives information of the accident, the sooner help from the Professional Association may begin (treatment, vocational welfare assistance, accident compensation in cash) for the injured person or members of his family.

Fill out forms carefully - family status of the injured person, number of children under eighteen years of age, cause and detailed description of accident - since this will save you and the Professional Association time-consuming inquiries. Accidents which presumably shall result in work disability (complete or partial) of three days or less need not be reported. The corresponding entries are to be made in the regulation dressing station register concerning these accidents.

End of the first page of the original.

(Page 5 of original)

5. a) To Which Hospital Was the Injured Person Taken or is He at Home? a) in the camp
- b) Name, City, and Residence b)
- I. of the person who Gave First Aid (Mole Plant Nurses, Municipal Nurse, Plant Aides, and Others, with Exact Date Concerning Day and Hour of First Aid
- II. of the Physician First Called II. Dispensary Physician
- III. of the Physician Now Giving treatment III.
- c) In Case the Injured Person Has Been Taken to a Hospital: up to What Day Is the Injured Person Entitled to Full/Partial Compensation?
6. a) To What Sick Insurance Fund Did the Injured Person Belong at the Time of the Accident?
- b) Before the Accident, Was the Injured Person Capable of Full-Time Work? b) Yes
- If Not, Why?

(page 6 of original)

- c) Is the Injured Person Receiving.
Accident or disability Payments,
Miners Pensions, Retirement/
Annuity, or Other Income on the
Basis of Reich relief?
From Whom?
7. Cause and detailed description of Accident.
The Accident and its Causes are to be
Described as Detailed as Possible.
Following Questions are to be
answered:
- | | |
|--|---|
| a) Where Accident Occurred?
(e.g., Machine, Foundry,
pit, Crane) | During the loading
of pipe castings a
pipe slipped from
the stock and fell
on the left foot of
the PW causing
contusions. |
| b) What Was the Injured Per-
son Doing at the Time of
the Accident?
(e.g., Servicing a Machine,
Oiling, etc.) | |
| c) Cause of Accident
e.g., Defects in the Machine
(Manufacturers' Data, if
Possible also Type and Year
of Construction) or
Other Reasons (e.g., Filling
Objects, etc.) | |
| d) Sundry Remarks. | |
8. What Measures - Technical
Protective Measures, Plant Or-
ganization, Instruction of
Employees - Have Been Taken to
Prevent Such Accidents in the
Future?

(page 7 of original)

9. Witnesses:

- | | |
|-------------------------------|-------------------------|
| a) Who saw the accident? | b) Friedrich ULLMERICH, |
| (Information of Eyewitnesses) | Foreman, Linburgerhof, |
| b) In the absence of | Hanserstr. 18 |
| Eyewitnesses Who First | b) |
| Received Information | |
| of the accident, and When? | |

10. If the report was submitted too late, why did this happen?

Ludwigshafen/Rhine, 20 September 1943.

I.G. FARBEINDUSTRIE AG (I.G. CHEMIE)

Page 49 of original

COPYA F F I D A V I T

We, the undersigned,

- 1) M a i r, Josef, born on 5 November 1886, at Kleinhochkirchen, residing at Ludwigshafen/Rhine, wolframstrasse 14, Prokurist, working for the I.G. Farbenindustrie Aktiengesellschaft, Ludwigshafen/Rhine, since 1940, since 1940 supervisor of the factory accounting office at the Ludwigshafen-Oppau Plant, and
- 2) M u e l l e r, Dr. Fritz, born on 1 March 1892, at Leisnig /Saxony, residing at Ludwigshafen/Rhine, Kochlstrasse 6, chemist, employed by the Badische Anilin- & Soda-Fabrik, Ludwigshafen/Rhine, since 1920, since 1938 section chief of the plant guard section,

have been duly warned that we render ourselves liable to punishment if we make a false affidavit. We declare that our statements are the full truth, and we have been advised that they are to be submitted as evidence before the American Military Tribunal at the Palace of Justice in Nuernberg, for Case VI.

Because of our professional experiences as former officials in charge of plant air-raid installations and/or as officials in charge of the factory accounting office, we confirm that during World War II and in the time up to and including 26 July 1944, thirty-four air-raids were made on the Ludwigshafen-Oppau Plant, and that the damage caused by these air-raids up to the above - mentioned date amounted to RM 90,175,653.--

Ludwigshafen/Rhine, 6 February 1948 .

(Signed) : Josef Mair

(Signed): Dr. Fritz Mueller

Page 50 of original

I hereby certify and attest that the above signatures of Herr Prokurist Josef M e i r, residing at Ludwigshafen Rhine, Jolframstrasse 14 and Herr Dr. Fritz Mueller, residing at Ludwigshafen/Rhine, Voehlerstrasse 6, have been affixed before Lawyer Dr. Wolfgang Heintzeler, Ludwigshafen/Rhine, Bruckstrasse 13.

Ludwigshafen/Rhine, 6 February
1948

(Signed): Dr. Wolfgang Heintzeler
Lawyer

Page 51 of original

COPYA F F I D A V I T

I, Johann L a t z k o , born on 22 November 1912 in Pilsen, Czechoslovakia, at present residing in Ludwigshafen Rhine-Oppeu, Rheinstrasse 136, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice in Nuernberg, Germany.

- 1.) In 1945 I came to Ludwigshafen/Rhine from Czechoslovakia as a foreign worker, and I was employed as kitchen help in the kitchen of Camp II of the I.G.Farben-Industrie Aktiengesellschaft, which housed French and German employees. In September 1945 I was transferred to the POW camp as supervisor of the kitchen and in charge of organizational arrangements. In particular it was my duty to order the necessary food supplies required for the POWs and the guards in the mess hall.
- 2.) I ordered those food quantities based on the ration scales for POWs, which were monthly passed on to me by the Storage and Supply Department. Each POW was in a special group according to his work output, either under the classification of regular worker, overtime worker, or worker performing the heaviest type of work. Each POW received a meal ticket for each individual week,

Page 52 of original

from which his ration scale could be seen. By this scale he was issued the rations due to him.

- 4.) I and POW cooks compiled the menus for the individual weeks. We then submitted these menus to the Storage and Supply Department for approval, and after they had been okayed they were posted in the messhall of the POW camp.
- 5.) The kitchen equipment was excellent. In the beginning we had sixteen boilers with a capacity of 300 liters, which were increased to eighteen later on, two electric frying pans, one electric oven, a "universal" machine for peeling potatoes and preparing of vegetables and a large meat mincer. The quality of the food we received was always above board, and we never used foodstuffs for preparing meals which were not fit for human consumption.
- 6.) Generally the POWs were very well fed. There were frequent food checks. I have not heard that anyone was undernourished.
- 7.) Other hygienic conditions in the camp were equally good. There were two bath houses equipped with sufficient bath installations as well as with hot and cold running water, and a decontamination barracks; this latter barracks is still standing.
- 8.) There were excellent shelters inside the camp for use during air raids. Then later on, toward the end of 1944, air raids occurred increasingly, the POWs were permitted

Page 53 of original

to go to the air-raid shelters in the plant, or use the shelters in the bridge-head of the Autobahn near Frankenthal.

- 9.) For the most part the German population from the villages of Oppau and Edigheim used those shelters in the bridgehead, although they had a long distance to go until they got there, a distance which was at any rate greater than the one from Camp V to this bridgehead. The POWs themselves were not obliged nor were they compelled by us to use this bridgehead; they were permitted to use a plant shelter, which was about five to ten minutes away from the camp. The camp commander had his own keys for two plant gates which were always opened even during the first alert, so that the POWs had sufficient time to reach the plant shelters. I lived quite close to the camp, and I always accompanied the POWs either to the bridgehead or to one of the plant shelters.
- 10.) The camp was hit on several occasions, and camp installations and equipment naturally suffered considerably. However, repair work was always expedited, and the damage repaired. If the water supply failed, we used to pump water from a nearby well in the camp kitchen, using a gasoline driven pump. If we had enough water to be used in the kitchen, provisions were also made that water was supplied to the bath barracks, so that the POWs had sufficient bath facilities inside the camp. Also, there were two large water reservoirs in the camp which were constantly filled with water, so that there was also enough water for their laundry.

Page 54 of original

It never took very long to repair damage on the
water supply system.

Ludwigshafen/Rhine, 8 January 1948

(Signed) J. Letzko, Johann

I certify and attest that the above signature of
Johann L e t z k o, of Lu-Oppau, Rheinstrasse 136,
has been affixed before Lawyer Friedrich Wilhelm
Wagner, of Ludwigshafen/Rhine.

Ludwigshafen/Rhine, 8 January 1948

(Signed) F. W. Wagner

Lawyer

Page 55 of original

I.G. Ludwigshafen
Storage and Supply Department

Prisoners of War

29 August 1944 P/F.-III-

Menu for the 37th Pay Period Starting 3 September to 9 September 1944

Day	First and Second Breakfast	Bread	Lunch	Supper
Sunday 3.	Coffee beverage 25 g. margarine	300 g.	Meat joint 90 Gravy 6 g. of fat Red cabbage 500 g. R Potatoes 500 g. K. 10 g. Me.	Home-cooked potato soup 2 g. of fat 100 g. potatoes 10 g. Me. 300 g. vegetab- les
Monday 4.	Coffee beverage 25 g. Margarine 50 g. jam	300 g.	Soup 20 N. 2 fats 10 Me 50 potatoes fat 200 vegetab- les	Meat loaf 40 40 meat Cabbage 6 g. fat 400 g. K 10 g. Me 100 g. of bread potatoes - what- ever available
Tuesday 5.	Coffee beverage 25 g. margarine	300 g.	Soup	Maccaroni 50 g. N Goulash gravy 30 g. meat Washed potatoes 400 g. K 6 g. of fats and 10 g. Me
Wednesday 6.	Coffee beverage 50 g. jam 150 g. sugar	400 g.	Soup	Brown potatoes vegetables 20 g. Me 700 g. potato 12 g. fats
Thursday 7.	Coffee beverage 25 g. margarine	300 g.	Soup	Hamburgers 40 g. meat Gravy 6 g. fat and 10 g. Me Carrots 300 g. Potatoes 400 100 gr. bread potatoes, what- ever available

Page 55 of original cont'd

Day	First and Second Breakfast	Bread	Lunch	Supper
Friday 8.	Coffee beverage 25 g. margarine 50 g. jam	300 g.	Soup	Cream cheese 125 Unpeeled potatoes 600 g. K. 100 g. bread/potatoes, whatever avail- able
Saturday 9.	Coffee beverage 25 g. margarine	300 g.	Goulash 50 g. meat Cabbage 500g. K. 5 g. fats and 10 g. Ks	Vegetable soup with potatoes 300 g. vegetables 10 g. Me 2 g. f. 100 g. potatoes 100 g. bread/ potatoes, what ever avail-ble

Page 56 of original

Distribution Key

Herr Wiens	1	Herr Klek	1
Herr Schmid	1	Herr Dr. Krafft	1
Herr Petry	1	Herr Dr. Bischoff	1
Herr Olbert	1	Herr Huelter	1
Herr Bohnert	1	Food Storage Warehouse	1046
Herr Latsko	1	Guard Headquarters	1
Kitchen 1102	2	Guard Luitpold School	1
Camp administration	1	Shop Stewards' Council	1
		Herr Hauck	1

18

Page 57 of original

COPY

Herr Lieutenant S p e c h t

Commander of Guards for POWs in the Plant.

Personnel Department
28 June 1940 M/A.M.

Bath Facilities for POWs.

In order to arrange one weekly bath for the prisoners, we are informing you of the following procedure:

1. Bath. The bath in Building Op 130 (ground floor with 72 showers) is to be used.
2. Bath days. Baths can be taken during the whole week, so that the 500 men are split up in equal groups for the days Monday through Sunday.
3. Times of bath. The times at which baths can be taken have been fixed at 1930 hours through 2030 hours. The men will have to bring along their towels and soap.
4. Sundry regulations. Prisoners will be conducted in groups to take their bath. The guards will be responsible for maintaining order and discipline in the baths. It is strictly prohibited to tamper with any of the cupboards in the bath. On entering the bath house the leader of the guards will hand in a slip made out by the camp commander to the bath attendant, on which date and the number of prisoners taking a bath will be entered.

Kindly inform this office when the bath house will be used first.

Personnel Department
(Signed) :Hoffmann

Carbon copy to Herr Laydecker, in charge of bath houses.

Page 59 of original

copyI.G.FARBENINDUSTRIE AKTIENGESELLSCHAFT
Personnel Department

Ludwigshafen/Rhine, 1 November 1941/712.

To all Plants Employing POWs.

An order of the OKW, POW Division, resulted in very stringent measures as far as our paying of POWs is concerned.

1. Polish POWs who are not doing piece work are being paid a monthly wage of not more than RM 13.--, which is a daily pay of 50 Pfg. for all working days. According to this order, Sundry work cannot be specially paid for if continuous work during working days has been allocated. Provisions have been made, however, to pay them a special bonus which must not exceed RM 5.-- per month.
2. French POWs. The permissible monthly wage scale to be paid out in this case amounts to RM 18.--, which, if split up, corresponds to a total working time of 26 days at RM 0.70 per day. In this case, too, it is not permissible to pay any additional remunerations for Sunday work. It is, however, possible to pay the French POWs a monthly bonus up to RM 5.20.
3. The only way by which we can secure a better remuneration for the POWs is their allocation to piece work. If they do piece work it is possible to pay them up to an additional thirty percent of their hourly piece rates. This would mean.

Page 59 of original

that POWs, if this course is taken, will receive an additional RM 0.10 per hour which can be paid out in full .

We would recommend that this piece - work arrangement be used as much as possible in the allocation of specified jobs in order to maintain the POWs' interest in their work.

Personnel Department

Copy

AFFIDAVIT.

I, the undersigned Oskar HERMANN, residing at Ludwigshafen on the Rhine Kochlerstr. 11, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice at Nuernberg/Germany.

On 17 June 1917 I entered the employment of the Ludwigshafen - Oppau Plant, subsequently the I.G. Farbenindustrie Aktiengesellschaft; during the war I was in charge of the pay office at Ludwigshafen. In this job it was my duty to compute the pay checks for the POWs employed in the Ludwigshafen Oppau plant. Payment procedure was as follows: the pay scales which had been officially fixed for the plant in order to remunerate POWs for their work were to be remitted to the Wehrmacht POW main camp (Stalag), which was under the administration of the Wehrmacht authorities; then, the POWs were directly paid by the Stalag. Herr Dr. WURSTER instructed me to submit regular reports concerning the financial matters pertaining to POWs, and he repeatedly directed me to do everything possible in order to bring about that the POWs working in the plant should receive as high a remuneration as possible. Today I cannot recall all pertinent details of this very complicated pay computation for the work performed by the POWs;

(page 2 of original)

however, I can remember very well indeed that Dr. MURSTER repeatedly instructed me to call on the Staling Administration, and to negotiate with the Staling authorities concerning an improved financial status for the POWs, especially concerning an increased amount of net payments to the POWs. I also recall that in some individual cases it was possible by virtue of these negotiations to bring about certain improvements for the POWs.

Ludwigshefen on the Rhine, 23 September 1947

Signed: Oskar HERLMANN

I certify and attest that the above signature of Herr Oskar H. HERLMANN, residing at Ludwigshefen on the Rhine, Schlerstr. 11, has been affixed before me, Dr. Wolfgang HEINTZELER of Ludwigshefen on the Rhine, Brunckstr. 13.

Ludwigshefen on the Rhine, 23 September 1947

Signed: Dr. Wolfgang HEINTZELER
Lawyer

Copy

AFFIDAVIT.

I, the undersigned Otto ECKERT, born 27 December 1889, residing at Heidelberg Kaiserstr. 41, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice in Duernberg, Germany for Case VI.

1. Since 1 July 1911 I have been in the employ of the Badische Anilin - & Soda Factory at Ludwigshafen on the Rhine. Since 1919 I have been consultant for worker labor relations, and since 1939 I have been the chief of the personnel department, subsection workers, in the Badische Anilin - & Soda Factory. Because of my work during the war I am fully acquainted with all matters pertaining to labor allocation, also in the case of foreign workers and those POWs who had been assigned to the plant.
2. The foreign workers and POWs who had been assigned to the Ludwigshafen - Oppau Plant during the war by order of the labor office, had, in principle, the same working hours as the German workers who were assigned to corresponding jobs. Due to administrative difficulties it would have been practically impossible at all to introduce different working hours for the German workers on one hand and for the foreigners and POWs on the other hand, especially as the foreign workers, as well as the POWs, invariably worked in conjunction with the German workers.

Document Book V 'URSTER
Document No. 233

(page 2 of original)

Ludwigshafen on the Rhine, 29 January 1948

Signed: Otto ECKERT

I hereby certify and attest that the above signature
of Herr Otto ECKERT has been affixed before me, Dr.
Wolfgang HEINTZELER of Ludwigshafen on the Rhine,
Brunckstr. 13.

Ludwigshafen on the Rhine, 29 January 1948

Signed: Dr. Wolfgang HEINTZELER
Lawyer

Copy

L.S.14. care of Dr. STAUF-
FERT

SFIDA VET.

I, the undersigned D. Hermann KETTERER, residing at Mannheim, D.S.14., have been duly warned that I render myself liable to punishment if I make a false affidavit.

I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Palace of Justice in Nuernberg, Germany for Case VI.

My testimony is made on the basis of my 25 years of work in the insurance business, and the inside experiences I have gained in the field of industrial fire insurances.

Accordingly, I confirm that in the plants of the chemical industry fire and explosion hazards compared to other industrial branches, are generally not to be called particularly serious hazards.

Signed: Dr. H. KETTERER

I certify and attest that the above signature of Dr. Hermann KETTERER has been affixed before me, Dr. Wolfgang HEINTZLER of Ludwigshafen on the Rhine, Brunckstr. 13.

Ludwigshafen, 30 January 1948

Signed: Dr. Wolfgang HEINTZLER
Lawyer

Copy

PROFESSIONAL ASSOCIATION OF THE CHEMICAL INDUSTRY,
SECTION VI

MANNHEIM
Renzstrasse 11/13

AFFIDAVIT.

I, the undersigned Julius BITH, born on 9 April 1884, residing at Reddesheim near Mannheim, Oberdorfstrasse 38, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare on oath that my statement is the full truth and that it has been made in order to be submitted as evidence before the Military Tribunal at the Police of Justice in Nuerenberg, Germany for Case VI.

I am the Referent and acting business manager of Section VI of the Professional Association of the Chemical Industry, the officially licensed accident Insurance Company. The hazard wage scale of our professional association has been fixed for the individual branches according to hazards which might be incurred, and has been divided up into hazard categories, which range from hazard category 3 through 38. Hazard category 3 comprises such plants which have the lowest hazards, and hazard category 38 consists of plants which have major hazards for their employees. The Badische Anilin- & Soda Factory at Ludwigshafen on the Rhine has been classified in Hazard Category 11 for its Ludwigshafen Plant and, in category 10 for its Oppau Plant.

(page 2 of original)

The Ludwigshafen Plant therefore cannot be considered a
major hazard plant.

Ludwigshafen near Mannheim, 26 January 1948

Signed: Julius EITH

The above signature of Herr Julius EITH has been affixed
before me, Dr. Wolfgang HEINTZELER of Ludwigshafen on
the Rhine, Branchstrasse 13, which I hereby certify
and attest.

Ludwigshafen on the Rhine, 26 January 1948

Signed: Dr. Wolfgang HEINTZELER
Lawyer

Copy

AFFIDAVIT.

I, the undersigned Karl TRUTHBEIN, Minister, born on 18 February 1897 in Reinheim/Saar, residing at Ludwigshafen on the Rhine, Vicarage of St. Dreifaltigkeit Gerdelorplatz 16, have been duly warned that I render myself liable to punishment if I make a false affidavit. I declare that my statement is the full truth, and I have been informed that it will be submitted as evidence before the American Military Tribunal at the Palace of Justice in Nuremberg for Case VI.

The undersigned, in his capacity as minister of the St. Dreifaltigkeit Vicarage at Ludwigshafen which belongs to the jurisdiction of the B.S.F., declares that in the summer of 1943 and upon instigation of Dr. WURSTER the camp custodian FIEFF requested me to secure the church authorities assistance in holding church services for the prisoners, that is the civilian internees both French and Polish, in camp V. Dr. WURSTER was particularly interested that spiritual care was to be given to the prisoners in order to alleviate their plight.

Ludwigshafen on the Rhine, 20 November 1947

Signed: TRUTHBEIN
City Chaplain

Sent: Ludwigshafen on the Rhine
The chief of Police
Police Precinct 6

For the authenticity of the signature:

Ludwigshafen on the Rhine, 27 November 1947

Signed: MAURER

Copy

Affidavit

I, the undersigned Dr. Fritz K u e l l e r, born on 1 March 1892 at Leisnig/Saxony, residing in Ludwigshafen on the Rhine, Weehlerstrasse 6, chemist, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence before the Military Tribunal in the Palace of Justice in Nuremberg, Germany.

91) Since 1920 I have been employed by the Badische Anilin- & Soda-Fabrik Ludwigshafen on the Rhine and from 1938 on I was chief of the "Plant Guards" (Verkschutz). The plant guard included among others plant air-raid protection.

(2) In my capacity as chief of the plant air-raid personnel I was informed on 8 September 1944 at 13.55 hours that an American airman had baled out and landed on the banks of the Rhine at the north part of our plant. According to the existing directives issued with regard to such cases by Dr. Wurster in his capacity as plant manager of the Ludwigshafen-Oppeau plant, I immediately instigated measures so that the airman received all necessary aid and so that he was brought to the rooms of the plant air-raid-office.

(4) He arrived there at 17.10 hours. His name was Donald L. BRADZICKS, AGa-20, born 12 January 1924. He was given some refreshments; then he stayed in the air-raid shelter of the plant management where Dr. Wurster personally met him. When he later, at 19.55 hours,

- 2 -

as a prisoner of war was picked up by representatives of the Wehrmacht, Ob. W.M. MAYER, he expressed his gratitude for the help he had received. I wish to note that this took place in agreement with Dr. Wurster's, directives at a time when the population already had been urged by propaganda to show no indulgence toward enemy airmen who had bailed out.

(3) During the battles for the town of Ludwigshafen on 24 March 1945 at 2.10 hours two wounded Americans accompanied by a medical man by the name of James Jabsen were delivered at the first-aid station in the air-raid shelter Lu 44 of the Ludwigshafen-Opau I.G. Farben plant. In accordance with the directives by Dr. Wurster by which Allied soldiers should be treated with extreme correctness and especially wounded persons with greatest readiness to help, the wounded persons received the required medical aid at our first-aid station. Then they were taken to the military hospital in the plant ambulance. Also these Americans were visited by Dr. Wurster ~~personally~~ personally in order to make sure that they had received regular treatment.

Ludwigshafen on the Rhine, 16 January 1948

(signed) Fritz Mueller

The above signature of Dr. Fritz MUELLER, affixed before me, Dr. Wolfgang HEINZELER, Ludwigshafen on the Rhine, Bruckstrasse 13, is hereby certified and witnessed by me.

Ludwigshafen on the Rhine, 16 Jan 1948

(signed) Dr. Wolfgang Heintzeler
attorney-at-law

- 63 -

Copy

In the German language.

Kolasa Mieczysław
Zgierz Stosna 4
Poland

Zgierz, 24 October 1947

To the

I.G. Farbenindustrie
Ludwigshafen on the Rhine
Building 1

Request

I hereby address this letter to the I.G. Farbenindustrie Management, Ludwigshafen on the Rhine, requesting them kindly to give me a work certificate which I have to submit at my test for electro-mechanic.

I, M. Kolasa, former Polish prisoner of war, No. 24817, plant No 13580, worked as so-called electrotechnician under the masters Weindel and Jesberger in the electrical shop building 885, from 1 March 1942 till 15 March 1945 (until the prisoners of war were evacuated). May I state that during this period I had some persons as assistants for performing the work in the electrical installation plant, main laboratory, buildings 6, 565, 115, 40 and in the "Pfalz" plant, building 241.

Since I have to pass my examination here in Poland (Lodz) I humbly ask the I.G. Farbenindustrie Management to give me a work certificate as electrotechnician for the above mentioned time.

The master Herr Weindel and Herr Jesberger as well as the electricians Herr Neumann, Schwab and Winkler, with whom I worked together all the time, can give you information concerning my person.

Hoping that the Direktion will not refuse my request and will send me the certificate which is so important for me and thanking you in advance,

I remain,

Yours very truly,

(signed) M. Kolasa

Copy

Affidavit

I, Anton ~~BERG~~ ~~R~~, born 12 December 1898, residing in Ludwigshafen-Rheingoenheim, Luitpoldstrasse 41, having been duly warned that I make myself liable to punishment if I make a false affidavit, declare under oath that my statement is true and was made in order to be submitted as evidence in the Palace of Justice, Nuernberg, Germany.

On 28 May 1913 I started work as electrician with the Badische Anilin- und Soda-Fabrik Ludwigshafen on the Rhine. At the beginning, I was employed in various departments of the plant and for about the last twenty years I have without interruption been working in the electrical department of the main laboratory. In 1941 I became master. During the war foreign civilians and prisoners of war were constantly assigned to my department. The persons involved were throughout skilled or trained electricians. They fully cooperated with the German workers and superiors. I remember that from March 1942 till September 1944 the Polish prisoner of war Michael KOLASA was employed in my shop. He was an especially capable and conscientious worker who liked his job and took pains to learn something. He spoke and wrote German expertly, and studied for himself as well as under my instruction to increase his professional knowledge. I, therefore, appointed him group leader and gave him extensive independence with regard to the supervision and control of his group which consisted of four to six men. Thus Kolas

- 2 -

filled in the piece work slips for himself and his group, determined priority jobs received the materials according to his own specification. Kolasa carried out work in the special fields of heating and motor installation, signal and safety equipment for the experimental station of the technical experimental school. There never existed any special supervision of the prisoners of war employed in my shop. They could move about just as freely as any German worker.

I am familiar with the letter from Michael Kolasa of 24 October 1947 which he sent to the Direktion and in which he asks for a work certificate. Weindel, Neumann, Schwab and Winkler mentioned by Kolasa in this letter were also employed in my shop. I can only confirm that the relations between them and Kolasa were good.

Ludwigshafen on the Rhine.

6 January 1948 (signed) Anton Jesberger

The above signature of Jesberger Anton, Ludwigshafen-Rheingoenheim, Lautpoldstrasse 41, affixed before Friedrich Wilhelm Wagner, Attorney-at-law, Ludwigshafen on the Rhine, is hereby certified and witnessed by me.

Ludwigshafen on the Rhine, 6 January 1948

(signed) F. W. Wagner

- 73 -

DOCUMENT BOOK III, URSTER

CERTIFICATE OF TRANSLATION

5 April 1948

We, Wern Solander, William Zirkel, Ludwig Meymann,
and Robert E. Clark, hereby certify that we are duly
appointed translators for the German and English
languages and that the above is a true and correct
translation of the DOCUMENT BOOK V, URSTER.

Wern Solander
20096

William Zirkel
B-397928

Ludwig Meymann
35096

Robert E. Clark
B-397939

Case 6
Defense

TRIBUNAL VI

CASE VI

DOCUMENT BOOK VI

for

Dr. Carl WURSTER

Presented by the
Defense Counsels

Atty. Friedrich Wilhelm

WAGNER

Atty. Dr. Wolfgang

HEINTZLER

Wang



Table of Contents to Document Book VI
for Dr. Carl Wurster & Co., Case VI.

Doc. No.	Exh. No.	Contents	Page
----------	----------	----------	------

Count III of the Indictment (continued)

Supplementary documents on Degesch concerning the relationship between the Ludwigshafen plant and Dr. Wurster to the Degesch. (Deutsche Gesellschaft fuer Schaedlingbekämpfung - German Association to Combat Vermin).

201		Affidavit of Dr. Theo Goldschmidt, general director of the Theo Goldschmidt A.G. in Essen dated 2 Jan. 1940. The Theo Goldschmidt A.G. has a 15% interest in the Degesch since 1930. Affiant states that the technical collaboration between the Ludwigshafen plant and the Degesch pertained mainly to Ethyl-Gride, Calcid and Tentox, while there were no closer connections between Ludwigshafen and Degesch in regard to Zyklon. Affiant further states that Dr. Schumann, who was in charge of Calcid production at Ludwigshafen, was appointed to the Verwaltungsrat of Degesch in 1930, and that after he was pensioned he was succeeded by Dr. Wurster, in whose field the production of Calcid fell. The Verwaltungsrat meeting of 19 June 1940, at which Dr. Wurster was elected, was the only Verwaltungsrat meeting that took place during the war.	1 - 3
546		File note of Dr. Wurster dated 28 June 1940 about the shareholders meeting and Verwaltungsrat meeting of the Degesch on 19 June 1940, with a short account of the personnel changes decided upon in the business management and Verwaltungsrat Committee of the Degesch. Dr. Wurster remarks verbatim: "The selection of leading personnel of Scheideanstalt and IG was made less because of Degesch, but rather because this committee is suitable for a discussion of the current basic problems of both firms during the conference."	4 - 5
244		Affidavit of Dr. Pfauemoller, head of the Inorganic Section of the Ludwigshafen plant since 1938, dated 28 Jan. 1948. Affiant states that Ludwigshafen did not work in any way with the Degesch on Zyklon before the collapse. At the request of Dr. Wurster the affiant represented the Ludwigshafen plant at the shareholders meeting on 4 September 1942.	6 - 8

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
244		At this meeting nothing was discussed that might have given the slightest hint of the misuse of Zyklon to kill humans. Affiant did not hear of the extermination of humans in concentration camps and the use of Zyklon for that purpose until after the collapse, and is convinced the same is true for Dr. Wurster.	6 - 8
232		Affidavit of Konrad Gabel dated 6 Jan. 1948. Until he was pensioned on 30 June 1946, affiant was Betriebsfuhrer in Calcid production at the Ludwigshafen plant and was constantly in contact with the Degesch concerning Calcid from 1930 until 1945. In this position he never heard a reference or a hint of any kind that Zyklon was being used for any abnormal purposes. The idea of the possibility of such a misuse never even occurred to the affiant.	9 - 10
298		Affidavit of Dr. Wolfgang Baelow dated 15 March 1948. Affiant has been, since 1940, director of the section of the Ludwigshafen plant that prepared the insecticides that had an organic base (this section was not subordinate to Dr. Wurster in technical matters). Affiant occasionally had contact with people from the Degesch during the 2nd World War; in this he never heard the slightest reference that a Degesch product was being used in the concentration camps to kill human beings. He did not hear anything at all about the mass murders until after the collapse and considers it out of the question that Dr. Wurster could even have had the slightest suspicion of these things. Affiant concludes: "His personality being what it is, he would, I am firmly convinced, never have tacitly tolerated these things, if he had known or even suspected anything about these circumstances."	11 - 1
294		Affidavit dated 11 March 1948 of Herr Dr. Wilhelm Pfennueller (head of the inorganic section at Ludwigshafen since 1938) of Dr. Wolfgang Baelow (head of the L.K. Department at Ludwigshafen since 1940) and of Hans Morgenthauer (personal secretary of Dr. Wurster's, through whom all of Dr. Wurster's mail had to go since 1938).	13 - 1

Table of Contents to Document Book VI
for Dr. Carl Wurster

Doc. No.	Exh. No.	Contents	Page
294		The affiants tell what reports the Ludwigshafen plant and Dr. Wurster received during the 2nd World War concerning the Zyklon business of the Degesch. Business or other reports of the Testa or the He's were never received. Furthermore, Ludwigshafen and Dr. Wurster received only the official annual business reports of the Degesch about Zyklon, production of which the last report received before the collapse is the one of 1942. The monthly turnover reports of the Degesch never came to Ludwigshafen.	13 - 15
231		Affidavit of Dr. Fritz Mueller dated 29 Jan. 1948. Affiant was head of the plant air raid protection service during the war. He states that he collected the pamphlets dropped by the Allied flyers during the war, but did not find any among them that mentioned mass murders of Jews in the Auschwitz concentration camp, or even the Auschwitz concentration camp itself or gassing of Jews in general. Affiant learned of these things only after the collapse and is firmly convinced that the same holds for Dr. Wurster.	16 - 17
253		Affidavit of Dr. Bernhard Cyriax dated 28 Jan. 1946. Affiant is a chemist at the Ludwigshafen plant and was an interpreter for the Military Government after the collapse. During this period he lived together with Dr. Wurster for months. He shows, through various incidents, the shock caused to Dr. Wurster by the revelation of the conditions and happenings in the concentration camps. "Dr. Wurster impressed me at that time as a man who was deeply shaken by a terrible truth of which he had been utterly ignorant up to that moment."	18 - 21
297		Affidavit of Karl von Heider dated 27 March 1947. Affiant was the head of a sales department for I.G. in Frankfurt a.M.	22 - 23

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
297		He knows Dr. Wurster from a long period of friendly collaboration and was regularly in contact with him during the 2nd World War. He confirms that neither he nor Dr. Wurster had any knowledge, before the collapse, of mass killings by gas with Zyklon and concludes: "On the basis of the whole personality of Dr. Wurster, which is marked by very high standards based on religious convictions, I am absolutely sure that Dr. Wurster would never have given his tacit assent if he had even had an inkling of the mass murders in the concentration camps and the use of the Degesch product Zyklon for this purpose."	22- 23
		Dr. Wurster's Personality.	
		<u>Judgment of Dr. Wurster by representatives of the Evangelical and Catholic churches.</u>	
272		Affidavit of Dr. Weber, pastor of the Christ Church in Mannheim dated 5 March 1948. Dr. Weber is a pastor of the Confessional Church (that is that part of the Evangelical Church that fought the hardest against the Nazi regime during the Third Reich), and was himself persecuted by the Gestapo. Dr. Weber knew Dr. Wurster personally during Hitler's reign and states that he did not let public indignation prevent him from sending his child to him in Mannheim to be instructed in the old faith. Dr. Wurster also wanted to give his child a strict Christian education in other ways. Dr. Wurster rejected the attacks on the foundations of Christianity that the Nazis always attempted, Bishop Wurm was Dr. Wurster's well trusted spiritual guide.	24 - 25
171		Petition of the Protestant dean's office in Ludwigshafen on the Rhine dated 26 June 1947 to the French Administration of the Ludwigshafen plant with the request that Dr. Wurster be allowed to remain in charge of the Ludwigshafen plant. Dr. Wurster is known in local Protestant circles as a distinguished man with noble sentiments throughout. "Whatever the representatives of our Evangelical welfare Society or our church communities came in contact with him, they would see that he possessed a complete understanding for the charitable and other interests of his Evangelical Church."	26 - 27
172		Petition of the Protestant District Church Council of the Flats to the French Administration of the Ludwigshafen plant requesting the release of Dr. Wurster.	28 - 29

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh.No.	Contents	Page
172		"As a member of the Evangelical Church, Dr. Wurster not only remained faithful during its time of stress, but also showed himself at all times to be exceptionally receptive to its desires for support of its spiritual and social activities."	28 - 29
190		Testimony of Prelate Monsignor Falzer dated 25 June 1947 with acknowledgement from the Catholic Episcopal Vicarage General in Speyer dated 25 June 1947. Monsignor Falzer reports on the personality of Dr. Wurster and states from his own memory that after the capitulation and the arrest of Dr. Wurster he had informed the American Colonel Hoover that "the Ludwigshafen-Oppau plant had had the best of relations with the church and its representatives and that the workers of the three groups - Christian, Social Democrats and Communist - approached Herr Dr. Wurster with confidence. The next day Dr. Wurster was set free by the American military authorities. In his person Herr Direktor Dr. Wurster enjoys the esteem and confidence not only of the members of his plant, but of the entire citizenry of Ludwigshafen on the Rhine as well."	30-32
167		Affidavit of the 5 Catholic priests of Ludwigshafen, Dean Busse, Prelate Falzer, Reverend Floerschinger, Rev. Treuthwein and Rev. Kraft, with a statement from the Catholic Episcopal Ordinate in Speyer dated 24 Nov. 1947. The five priests state, among other things: "As priests to whose district of spiritual care the BASF belongs, we are in a position to declare that no activity of Dr. Wurster within the Party or in favor of National Socialism has become known to us. We wish to emphasize that Dr. Carl Wurster had the best of understanding with all groups of workers."	33-35
273		Affidavit of the priest and dean Johannes Finck	

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
273		dated 10 Febr. 1948. Priest Knecht reports on the financial support that the plant under Dr. Wurster's leadership gave to the Catholic community Linburgerhof during the time of Hitler.	36 - 37
301		Affidavit of Rev. Otto Knecht dated 15 March 1948. Rev. Knecht, as deputy dean for the city of Ludwigshafen, reports on the contributions the I.G. plant in Ludwigshafen constantly made for charitable and church purposes, and that Dr. Wurster in particular was always gladly prepared to help and that Dr. Wurster had also personally gotten in touch with the representatives of the church. "I know from close personal talks with Herr Dr. Wurster that he stems from a Christian home and stands for an absolutely positive Christian faith."	38 - 39
<u>Excerpts of Dr. Wurster's Help for the Racially Persecuted.</u>			
149		Affidavit of Hans Morgenthau dated 30 Nov. 1947. Affiant was Dr. Wurster's personal secretary since 1938. He states that Dr. Wurster judged people, in theory and in practice, according to their worth without regard to race, religion or Party, and had rejected anti-Semitism. Affiant in particular describes the indignation Dr. Wurster showed after the excuses against the Jews on 11 November 1938.	40 - 41
112		Affidavit of Max Falkenberg dated 27 Nov. 1947. Affiant is a full Jew and has worked since 1921 as a construction engineer for the Ludwigshafen plant. Affiant describes the good treatment he received from the plant management during the time of the Third Reich and says in conclusion: "I consider it my duty to express my gratitude by acknowledging that the plant management of the Badische Anilin & Sodafabrik, particularly also during the time when Dr. Wurster was director and plant manager, has behaved towards me in such an understanding and kindly way. What I am thinking of in this regard is not even so much the material, but rather the immense moral aid that was tendered to me during this hard time on the part of the plant management and which gave me and my wife the strength to bear up during this time."	42 - 44

274	Affidavit of West Fahlberg, dtd 2 nd February 1948	45
476	Affidavit of Hans Schellenberg, dtd 15 October 1947	48
116	Affidavit of Dr. Fritz Fink, dtd 21 October 1947	50
104	Affidavit of Dr. Friedrich Bergmann dtd 21 Oct. 1947	53
184	Affidavit of Franz Reinhardt, dtd 22 October 1947	55
136	Affidavit of Dr. Hermann Linde, dtd 21 October 1947	58
181	Affidavit of Dr. Hans Korb, dtd 21 October 1947	60

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
252		Affidavit of Ernst Keller, dated 13 Dec. 1947. Affiant has worked for the I.G. plant in Ludwigshafen since 1927 and at present is head of the personnel section for university graduates. He describes the support Dr. Wurster gave to employees of the plant who were persecuted for racial reasons in the Third Reich. He gives a chart showing the payments in detail made to such persons during the period of the Third Reich, and also to a considerable extent to some who no longer worked at the plant.	62 - 75
		<u>Other documents concerning the personality of Dr. Wurster, especially in regard to his attitude to the NSDAP and war.</u>	
129		Affidavit of Dr. Fritz Holzberger dated 31 Oct. 1947. Dr. Holzberger has been a chemist at the I.G. plant in Ludwigshafen since 1924 and after the collapse became the presiding officer of the denazification commission of the plant. He confirms that Dr. Wurster, whom he knows since 1926, has never been a Nazi by inner conviction and that he was opposed to all martial enterprises, especially a war of aggression.	76 - 77
276		Affidavit of Dr. Fritz Holzberger dated 3 March 1948 (see doc. 129). Affiant confirms that from 1938 to 1945 only one of all of the department heads (Direktoren und Prokuristen) of all of the production departments of the I.G. plant in Ludwigshafen - Oppau, including the technical department for energy production, was a member of the Nazi Party (membership 1937, without rank.) He further states that a pronounced liberal political atmosphere prevailed at the I.G. plant Ludwigshafen-Oppau, in so far as such a thing was at all possible during the Nazi reign. "As far as I know the plant management never exerted even the slightest pressure to make the personnel join the National Socialist Party. It could also not be noticed that employees who were not members of the Nazi Party or its organizations were at any disadvantage." 78 - 79	78 - 79

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
137		Affidavit of Ernst Lorenz dated 6 Nov. 1947. Affiant has worked as a metal worker and assistant at the I.G. plant Ludwigshafen-Opau since 1920. Since 1945 he has been the chairman of the shop committee of the plant. Furthermore he is a member of the Diet for the Rhineland/Palatinate (Social Democratic Party) and has several responsible positions in the union movement. He describes Dr. Wurster as an extraordinary person with sympathetic and progressive ideas and as a passionate opponent of war. He further describes Dr. Wurster's distinct estrangement from politics during the period of the Third Reich.	80 - 82
113		Affidavit of Paul Fischer dated 23 Oct. 1947. Affiant was very prominent before 1933 in Catholic associations and the Centrist Party and therefore experienced considerable difficulties after 1933. In spite of this, Dr. Wurster employed him as a clerk in 1939 and promoted him, over the protest of the National Socialist shop council, to the position of plant manager. Affiant is a member of the shop committee of the Ludwigshafen plant since 1945.	83 - 85
115		Affidavit of Rudolf Frenzel dated 21 Oct. 1947. Affiant has worked for the I.G. plant in Ludwigshafen since 1934 and was active as a member of the Communist Party before 1933. Nevertheless, he was appointed by Dr. Wurster as the independent manager of a plant in Ludwigshafen in 1943. Affiant became a member of the shop committee of the Ludwigshafen plant in 1945; working together with Dr. Wurster from 1945-47 has convinced him that Dr. Wurster is a progressive, democratic and socially minded person. He describes how the confidence the workers had in Dr. Wurster manifested itself spontaneously in a strike when it became known that Dr. Wurster had been transferred from the hospital in Ludwigshafen to Kuerberg.	86 - 89
109		Affidavit of Otto Eskert dated 20 October 1947. Affiant has worked for the Ludwigshafen plant since 1911 and is an active Catholic. In spite of this Dr. Wurster appointed him as head of the personnel department for workers and kept him there throughout the entire Nazi regime despite all efforts of the Nazis to put one of their own men in that position.	90 - 91

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
108		Affidavit of Erich Day dated 20 Oct. 1947. Affiant has been employed as a commercial employee by the Ludwigshafen plant since 1922 and is an active Catholic. He describes how Dr. Wurster protected and sponsored him and other active Catholics during the Nazi regime despite attacks from the Party. 92 - 94	
187		Affidavit of Johannes Thone dated 20 Oct. 1947. Affiant has worked from 1922 until today at the Ludwigshafen plant, first in the laboratory and later in the inorganic department. Affiant is a Catholic and tells how Dr. Wurster, being a tolerant man, stood up for him in a special incident at the plant. He further describes Dr. Wurster's popularity with the workers and his negative attitude to the Party and the idea of war. 95 - 97	
132		Affidavit of Karl Joerges dated 29 Oct. 1947. Affiant has worked from 1912 until today at the Ludwigshafen plant as a laboratory worker and later on as a foreman. He describes Dr. Wurster as a man with a great deal of kindness and no false pretensions, for whom all of his coworkers were enthusiastic. In conclusion the affiant describes the humane attitude Dr. Wurster had towards the foreign workers employed in the plant. 98 - 101	
126		Affidavit of Dr. Joseph Hille of 23 Nov. 1947. Affiant has worked for the I.G. since 1933, and in Ludwigshafen-Oppau since 1937. Affiant was himself attacked politically during the time of the Third Reich and states: "It could be clearly seen from private conversations with Dr. Wurster that he was thoroughly opposed to the whole Nazi ideology as well as practice, out of his pronouncedly democratic political opinions and Christian religious sentiments..... The anti-Fascists of the Ludwigshafen- Oppau plant regarded him as a person they could well trust, who deeply regretted that his work had to be carried on under the political symbol he himself hated so much. 102 - 105	

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
179		Affidavit of Dr. Berthold Schnell dated 20 Nov. 1947. Affiant has been with the Ludwigshafen-Oppau plant since 1925 as a chemist, since 1942 as a Prokurist and at present is a department head. He finds the following to be especially valuable in the personality of Dr. Wurster: "His straight forward and sincere manner, his decent, unblemished character, his dignified, confidence inspiring attitude, his unequivocal and clear decisions, his understandingly attentive readiness to help in social problems, his high concept of duty and his constant willingness to sacrifice for the hard tasks of his position." "I can say without exaggeration that he was a model and an example in every respect. It is also my firm conviction that there is hardly anyone in the plant who would not confirm the character sketch given by me. Dr. Wurster was, and today still is, so to speak, beyond any personal criticism. He took great chances with the security of his person to ward off dangers threatening the continuance of the plant and to alleviate hardships to persons under his care. Dr. Wurster's achievements in this respect during the war, particularly during the last dramatic months and days, for the plant and its people, must be entered in the annals of the plant as a shining chapter on human greatness, if decency and human honor are not to become concepts without sense or meaning."	106 - 109
141		Affidavit of Dr. Hans Mohner dated 13 Oct. 1947. Dr. Mohner worked at the Ludwigshafen plant from 1902 until 1940 as a chemist, and towards the end as a Prokurist. During this period he learned to know Dr. Wurster not only as a man of unusual dimensions and rare technical and organizing abilities, but also as a deeply religious person who was firmly rooted in the fundamentals of Christian ethics and also conducted his daily life accordingly.	110 - 112

Table of Contents to Document Book VI
for Dr. Carl Wurster, Case VI

Doc. No.	Exh. No.	Contents	Page
141		<p>"When he took over the leadership of the Ludwigshafen-Opau plant on 1 March 1938, his primary aim was the perfection of the factory and the maintenance of its great tradition, as well as the welfare of the staff which he cared for with an extraordinarily well developed sense of justice and with much humanity and sacrifice." Dr. Mehner further described how, despite increasing worry, the conviction that the problems of Germany and Europe could be solved in a peaceful manner, again and again got the upper hand with Dr. Wurster. The declaration of war on 3 September 1939 depressed Dr. Wurster to the utmost and he made the following remark to Dr. Mehner: "You will see that this signifies the end of our beautiful plant and of our homeland. Because aerial warfare will destroy <u>everything</u> in this war. And anyway, we do not have adequate supplies for a technical war over a long period of time."</p>	

Dr. Mehner concludes:

"This deeply pessimistic discussion was finished by Dr. Wurster saying that we little individuals had no choice but to remain at the station to which fate had assigned us and to attempt our best for the preservation of the plant entrusted to us and for the people working there."

It is herewith certified that the papers contained in this document book are true and correct copies.

Dr. Wolfgang Heintzeler
Attorney.

Copy

DR. THEO GOLDSCHMIDT
TH. GOLDSCHMIDT A.-G.

ESSEN, 2 January 1948

Affidavit.

I, the undersigned Dr. Theo Goldschmidt residing in Essen
Bredeney, Am Wiosental 12, have been informed that I am
liable to punishment for making a false affidavit.

I declare in lieu of oath that my statement contains the full
truth and that it is made for the purpose for being submitted to
the Military Tribunal in the Palace of Justice, Nuernberg, Germany.

1. Since 1911 I am a member and since 1923 chairman of the
Verstand of Th. Goldschmidt A.G. Essen. Concerning my
personal history I am referring to the affidavit dated 31 December
1947 submitted for the purpose of its being submitted to the
Military Tribunal in the Palace of Justice, Nuernberg, in re:
Society for the Combatting of Vermin (Gesellschaft fuer
Schadlingsbekampfung) (Degesch).

2. The firm of Th. Goldschmidt-Essen, managed by me has a 12 1/2
capital interest in the Degesch since October 1930.
Supplementary to the above-mentioned statement dated 31 December
1947, I can add the following concerning relations of the IG
Farben - Ludwigshafen, and consequently that of Herr Dr. Carl
Wurster to the Degesch:

a) While the ZYKLON, invented by Herr Dr. Herdt, Degussa,
was the main world business of Degesch up to about 1929
Degesch, after being joined by IG, concerned itself to an

increasing extent with the so-called CALCID. This Calcid was a Ludwigshafen invention.

b) The technical relations between Werk Ludwigshafen and Degesch extended later to the so-called T-GAS, brought in by the firm of Goldschmidt (since 1931) and, still later to the CARTOX product (since 1939) because both of these products contain ethyl-oxyde which was produced by CHEMISCHE FABRIK HOLTEN GmbH, in which both IG and the firm of Goldschmidt were partners. While TRITOX which had been accepted by the sales department of DEGESCH in 1939 represented an IG Hoechst product, Ventox, which was introduced in 1941, again was based on a Ludwigshafen invention. Technical collaboration of Werk Ludwigshafen with Degesch thus primarily extended to Calcid and, in the second place to Ethyl-Oxyde (for T-Gas and Cartox) as well as to Ventox. According to my knowledge no close relation existed until the end of the war between Ludwigshafen and Degesch concerning Zyklon and - * - Tritox.

c) The product Calcid mentioned under No. 2, introduced into the Degesch was produced in Ludwigshafen in a department under the direction of Dr. Kurt Schumann; this connection resulted in the appointment of Dr. Schumann to the Verwaltungsrat of the Degesch by IG, after the latter had joined Degesch, in addition to the IG Vorstand members Mann and Weber-Andrae.

- 3 -

He remained in this position for 10 years up to the year 1940. After the retirement of Dr. Schumann, his successor concerned with the Calcid production was Dr. Wurster; accordingly Dr. Wurster, as successor of Dr. Schumann also was appointed to the Verwaltungsrat of the Degesch. This happened in the conference of the Verwaltungsrat on 19 June 1940. This conference, during which, as stated above, Dr. Wurster was appointed, was the only conference taking place during the war. Dr. Wurster did not participate in the shareholders meeting of the Degesch on 4 September 1942.

Dr.
signed: Theo Goldschmidt

I certify the above signature of Generaldirektor Dr. Theo Goldschmidt from Essen.

Essen, 3 January 1948

signed: Ewald Lenzeloh
Notary

Stamp

Record file No. 5/1948

- 3 -

Copy

I.G. Ludwigshafen

File Note

20 June 1940

Subject: Shareholder Meeting and Administrative Committee Conference
of the Degesch in Frankfurt/Main 19 June 1940.

Concerning point 1) and 2) of enclosed report.

To Point 3) Direktor Schlosser, Scheideanstalt, Frankfurt and
Generalkonsul Mann, IG Leverkusen resign from the management of
Degesch and join the Verwaltungsrat. Mann takes over the
chairmanship, Schlosser will be deputy chairman. In addition the
Verwaltungsrat also consists of Dr. Boka and Dr. Fischer from the
Vorstand of the Scheideanstalt and Dr. Wurster, IG Ludwigshafen.
Dr. Schumann, due to advanced age, has resigned amicably. The selection
of leading personnel of Scheideanstalt and IG was made less because of
Degesch, but rather because this committee is suitable for a discussion
of the current basic problems of both firms during the conferences.

To Point 4) ^{of} ~~The report~~ Dr. Peters concerns itself mainly with the past
and the future development of Trichloroethyl nitrite the so-called
Tritox. (cf p. 5 of the enclosed report). A survey of chemicals
employed in experiments has been turned over and is enclosed.

- 2 -

In order to make a larger circle of our chemists in (Ludwigshafen) and (Opladen) -) better acquainted with the problems of the combatting of vermin and perhaps to bring newly found chemicals or complaints to the Degesch, I have asked Dr. Peters to give a lecture in Ludwigshafen in the middle of July in La 510.

To Point 5) Dr. Peters was appointed as regular manager of the Degesch and Dr. Gassner and Dr. Bossert as deputy managers. The T-Gas company will be dissolved for simplification and will be absorbed by Degesch.

signed: Warster

- 5 -

Copy

Affidavit.

I, the undersigned Dr. Wilhelm Pfannmaier, born 15 February 1896 in Mainz, residing in Ludwigshafen/Rhine Wechlerstrasse 31a, have been informed that I am liable to punishment for making a false affidavit. I declare that my statement corresponds to the truth and was made for the purpose of being submitted to the Military Tribunal in the Palace of Justice in Nuremberg, Germany for Case 6.

1. I entered the service of Badische Anilin and Soda Fabrik on 21 March 1924 in Ludwigshafen/Rhine. Beginning 1 January 1938 to-date I am the head of the Inorganic Production Department of Werk Ludwigshafen.

2. The Inorganic Department under my management produced among other the insecticide Calcid which was sold by the Deutsche Gesellschaft fuer Schaedlingabholzung, the so-called "Degesch". In consequence there was a certain contact between the department under my management and Degesch. The product Zyklon, which plays a part in the trial, which was sold by Degesch, was not produced in Ludwigshafen previous to the collapse, since Zyklon was not an IG product at all. Preceding the collapse, Werk Ludwigshafen never collaborated with Degesch in any way concerning Zyklon.

- 2 -

3. By request of Dr. Wurster I represented Werk Ludwigshafen at the shareholder's meeting on 4 September 1942 in Frankfurt/Main. I can not recall the reasons today why Dr. Wurster did not participate in the meeting himself; it may be because he left Werk Ludwigshafen in the latter days of the war only rarely due to the increasing air raids.

4. In the course of the shareholder's meeting on 4 September 1942 nothing was discussed which might have referred in the slightest to the use of the Degesch-Product Zyklon for any purposes except the normal purposes of combatting vermin and disinfection. If, during this meeting I would have had even the least suspicion of such abuse I would of course have informed Dr. Wurster and, on the basis of his entire attitude, I am sure that he would have investigated this matter.

5. I heard of the annihilation of human beings for the first time after the collapse. This also applies to the fact that Zyklon was employed for these mass murders of which I read some time after the collapse in the newspapers.

- 7 -

- 3 -

The news concerning this, seemed so horrible to me that I did not believe for a long time that this information corresponded to the truth.

I am convinced that Dr. Wurster also did not hear anything at all before the collapse of the annihilation of human beings in the concentration camps and of the use of Zyklon for this purpose. Because I am sure he would have talked to me about that. On the basis of our intensive collaboration extending over many years our mutual relationship was so trusting that Dr. Wurster would not have hesitated to discuss such matters, which doubtlessly ^{would have} moved him strongly, to ~~talk~~ with me even during the time of the Third Reich.

Ludwigshafen/Rhine, 28 January 1948

signed: Pfennigsmüller.

I certify the above signature of Dr. Wilhelm Pfennigsmüller, Ludwigshafen Rhine, Wechlerstrasse 34 as executed in my presence. Dr. Wolfgang Heintzeler, Ludwigshafen/Rhine Brunkstrasse 13.

Ludwigshafen/Rhine, 28 January 1948

signed: Dr. Wolfgang Heintzeler

Attorney

Affidavit.

I, the undersigned Konrad Gabel, born on 30 August 1880 at Aschaffenburg, resident at Ludwigshafen on the Rhine, Arndtstrasse 85, having been warned that I should render myself liable to punishment by making a false affidavit, declare in lieu of oath that my statement is the truth and has been made in order to be submitted as an evidence to the Military Tribunal in the Palace of Justice Nuremberg, Germany.

- 1.) On 1 March 1926 I started employment with the Ludwigshafen plant of the I.G. Farbenindustrie Aktiengesellschaft and remained there until I retired with a pension on 30 June 1945. Beginning from 1928 until my retirement I was, among other things, Betriebsfuehrer of the Caloid manufacture, Caloid (Cyanooleum) is a well-known insecticide.
- 2.) When, in 1930, the I.G. Farbenindustrie Aktiengesellschaft had entered a partnership with the Deutsche Gesellschaft G.m.b.H. fuer Schaedlingsbekaempfung (German Corporation for Combatting Vermin), Degesch, contributing to that corporation as the main asset the Caloid, I maintained regular contacts with the management of the Degesch from that time until the end of the war in 1945. The object of my numerous conferences, in particular with Messrs. . Seidenheimer and Kaufmann of the Degesch, concerned questions of production, packaging and delivery of Caloid. On these occasions I also gained some insight in the methods of employing Caloid evolved by the Degesch.

- 8 -

3.) I know that the cooperation of the Ludwigshafen plant with the Degesch concerned in the main the insecticides manufactured in the Ludwigshafen plant. Ludwigshafen never had anything to do with the fabrication of Zyklon, as this product was manufactured and delivered to the Degesch by other plants, not belonging to the I.G.. During my conferences with the Degesch, which extended until the end of 1944, I never heard the slightest hint about the fact that the Zyklon, distributed by the Degesch, was ever used for purposes other than the normal combatting of vermin. The idea of such a possible abusive employment never occurred to me at all.

Ludwigshafen on the Rhine, 5 January 1948

(signed:) Konrad Gabel

The above signature of Herr Konrad Gabel, Ludwigshafen on the Rhine, Arndtstrasse 35, executed before me, attorney-at-law Dr. Wolfgang Heintzeler, Ludwigshafen on the Rhine, Bruckstrasse 13, is herewith attested and certified by me.

Ludwigshafen on the Rhine, 5 January 1948.

(signed:) Dr. Wolfgang Heintzeler

Affidavit.

I, the undersigned Dr. Wolfgang Buelow, born on 2 August 1899 at Radeburen (Curlandia), residing at Ludwigshafen on the Rhine, Wechlerstrasse 5, having been warned that I should render myself liable to punishment by making a false affidavit, declare in lieu of oath that my statement is the truth and has been made in order to be submitted as an evidence to the Military Tribunal in the Palace of Justice in Nuremberg, Germany for Case No. 6.

1.) Since 1940 I have been the director of the so-called L.K.-department of the Ludwigshafen I.G. plant (solvents, synthetics). In this department ^{of which} I am in charge, the insecticides made on an organic basis are among other things manufactured, the distribution of which, according to the contracts in existence, was turned over by the I.G. to the Degesch.

2.) From the distribution of the above-mentioned insecticides there resulted during the second world war occasional contacts between me and the gentlemen from the Degesch. On these occasions, however, I never heard the slightest hint about the fact that a product, distributed by the Degesch, had been used in the concentration camps for the extermination of human beings. As a matter ^{of fact}, I had, during the second world war, not the faintest suspicion of the murders committed in the concentration camps, having learned of them only after the collapse. If, during the second world war, I had known anything of these dreadful happenings, and if I had had the slightest suspicion that a product distributed by the Degesch was being misused for these purposes, I should in all circumstances have informed the management of the Ludwigshafen plant.

- 2 -

3.) Although the department of the Ludwigshafen plant directed by me was technically not subordinate to Dr. Wurster, my co-operation with Dr. Wurster, as the Betriebsfuehrer of the Ludwigshafen plant who had the control over all the social welfare institutions, was, during the second world war, so close that I am in a position to state with certainty as follows: In my view it is utterly impossible that Dr. Wurster had before the collapse, any knowledge, or even a suspicion of the mass murders in the concentration camps, I deem it even more impossible that Dr. Wurster knew of the abusive employment of the Degesch product Zyklon for those horrible purposes, or even, had the slightest suspicion of it; his personality being what it is, he would, I am firmly convinced of this, never have tacitly tolerated these things, if he had known or even suspected anything about • • • all these circumstances.

Ludwigshafen on the Rhine, 15 March 1948.

(signed:) Wolfgang Buelow

The above signature of Dr. Wolfgang Buelow, executed before me, Dr. Wolfgang Hointzeler, Ludwigshafen on the Rhine, Bruckstrasse 13, is herewith attested and certified by me.

Ludwigshafen on the Rhine, 15 March 1948.

(signed:) Dr. Wolfgang Hointzeler,
Attorney-at-law.

Affidavit.

We, the undersigned,

1.) Dr. Wilhelm Pfannmüller, born on 15 February 1896 at Mainz, residing at Ludwigshafen on the Rhine, "Ehlerstrasse 24 a

2.) Dr. Wolfgang Buslow, born on 3 August 1899 at Rüdbehren, Curlandia, resident at Ludwigshafen on the Rhine, "Ehlerstrasse 3

3.) Hans Morgenthauer, born on 30 March 1900 at Ludwigshafen on the Rhine, resident at Ludwigshafen on the Rhine, "Ehlerstrasse 8, having been warned that we should render ourselves liable to punishment by making a false affidavit, declare in lieu of oath that our statements are the truth and have been made in order to be submitted as an evidence to the Military Tribunal in the Palace of Justice at Nuremberg, Germany for Case 6.

1. a) I, the undersigned Dr. Wilhelm Pfannmüller, have been the head of the Inorganic Department of the Ludwigshafen I.G. plant since 1938. In the Inorganic Department I am directing, the insecticide Galdol is, among other things, produced. The distribution of this product has, in conformity with contracts concluded, been turned over to the Deutsche Gesellschaft fuer Schaedlingabkaempfung (Degesch).

b) I, the undersigned Dr. Wolfgang Buslow, have been the head of the so-called L.K. department of the Ludwigshafen plant of the I.G. since 1940. In my department, there are, among other things, produced the insecticides made on an organic basis, the distribution of which was, in conformity with contracts concluded, turned over to the Degesch.

c) I, the undersigned Hans Morgenthauer, have been the personal secretary to Direktor

Dr. Murster since 1938. In this capacity I had the entire incoming and outgoing or transit mail passing through my hands.

- 2.) The three undersigned persons have no knowledge of the Ludwigshafen plant or Direktor Dr. Murster having received during the second world war any business reports from the firms of Tesch & Stabenow in Hamburg (Tesch), or Heerdt-Lingler G.m.b.H. in Frankfurt on the Main (Heli), nor any business correspondence or other reports of these two firms.
- 3.) Furthermore, the three undersigned persons have no knowledge of the Ludwigshafen plant or Dir. Dr. Murster having, during the second world war, received any written statements concerning the Syzlon business of the Degesch or its subsidiary companies Heli and Tesch apart from the official annual business reports of the Degesch and even these only partly. The last business report of the Degesch received by the Ludwigshafen plant and consequently by Dr. Dr. Murster previous to the collapse, is the business report of the Degesch for 1942. The business reports for 1943 and 1944 were received by the Ludwigshafen plant and consequently by Dir. Dr. Murster only after the collapse.
- 4.) The three undersigned persons have in particular, no knowledge of the Ludwigshafen plant or Dr. Murster in person, having received monthly sales reports from the Degesch, which reports - as we were told now -, appear to have been forwarded regularly to the Leverkusen plant.

- 3 -

5.) The three undersigned persons affirm that according to the organisation of the Ludwigshafen plant it could not possibly have escaped the attention of at least one of the three undersigned, if, apart from the business reports of the Degesch as mentioned in sub-section 3.), the Ludwigshafen plant, or Direktor Dr. Hurster personally, had received any further written statements concerning the Zyklon business of the Degesch and/or the Testa, and/or the Heli during the second world war.

Ludwigshafen on the Rhine, 11 March 1948.

(signed:) H. Pfannmueller

(signed:) Wolfgang Buelow

(signed:) Hans Morgenthau

I herewith attest and certify the signatures of Dr. Wilhelm Pfannmueller, Dr. Wolfgang Buelow and Herr Hans Morgenthau, executed before me.
Dr. Wolfgang Heintzler, Ludwigshafen on the Rhine, Bruckstrasse 13.
Ludwigshafen on the Rhine, 11 March 1948.

(signed:) Dr. Wolfgang Heintzler

Attorney-at-law.

Copy

Affidavit.

I, the undersigned, Dr. Fritz Mueller, born 1 March 1892 in Leiszig/Saxony, residing in Ludwigshafen/Rhine Wosklorstrasse 6 have been informed that I am liable to punishment for making a false affidavit. I declare in lieu of oath that my statement contains the truth and that it was made for the purpose of being submitted in evidence to the Military Tribunal in the Palace of Justice in Euerberg, Germany for Case 6.

1. I am employed by the IG plant Ludwigshafen/Rhine as a chemist since 1920. During the war I was the head of the plant protection service which also included the plant air raid protection service.

2. During the entire war I attempted to collect the leaflets dropped by allied fliers over Ludwigshafen/Rhine and the neighborhood. I have kept the leaflets collected by me in this manner; however a part of them was taken along by an American major shortly after the occupation of Ludwigshafen.

3. None of the leaflets still available today make any mention of mass murders of Jews in Concentration Camp Auschwitz or even of Concentration Camp Auschwitz itself or of any gassing of Jews generally. I also recall clearly that none of the leaflets taken along by the American major made any mention of matters.

- 2 -

4. I myself had heard of the mass murders in Concentration Camp
Anschwitz and of the use of Zyklon for this purpose only after
the collapse. I am of the firm conviction that Dr. Wurster also did
not have even the slightest knowledge concerning these matters
before the collapse.

Ludwigshafen/Rhine, 29 January 1948

signed: Dr. Fritz Mueller

I certify the above signature of Dr. Fritz Mueller executed in my
presence, ^{Wolfgang} Dr. Heintzeler, Ludwigshafen/Rhine Brunckstrasse 13.

Ludwigshafen/Rhine, 29 January 1948

signed: Dr. Wolfgang Heintzeler
Attorney

Copy

Affidavit.

I, the undersigned Dr. Bernhard G y r i s, born 30 July 1909, residing in Ludwigshafen/Rhine Ernst-Lehmannstrasse 21 have been informed that I am liable to punishment for making a false affidavit. I declare in lieu of oath that my statement contains the truth and that it was made for the purpose of being submitted to the Military Tribunal in the Palace of Justice in Nuernberg, Germany for Case 6.

1. I am employed by the IG plant Ludwigshafen/Rhine as a chemist since 1935. After Ludwigshafen was occupied by American troops I became interpreter and representative of the plant with the American Military Government. I was appointed to this post because my mother was English by birth and consequently I speak English like I do. German and because I never was a member of the Party or any of its organizations.

2. During the period while I was interpreter and representative of the plant with the Military Government I resided for several months in with Dr. Wurster, at his invitation, in his apartment. My own apartment was uninhabitable and my family was evacuated to Weimar. So it happened that I held long conversations with Dr. Wurster every evening frequently lasting far into the night. We were in the habit of regularly listening to the radio broadcasts,

- 2 -

particularly those of the so-called Eisenhower Broadcasting Station. At that time the radio broadcast reports from the various concentration camps every evening as they were taken by American troops. While I myself, having listened to several such reports, declared that I could no longer listen to such horrible things Dr. Wurster demanded that we should carefully learn all details and that we had to stand the whole, bitter truth. Dr. Wurster impressed me at that time as a man who was deeply moved by a truth of which up to now he had been utterly ignorant.

3. When American troops took the city of Weimar on 12 April 1945, the radio broadcast many reports about Concentration Camp Buchenwald. Once, after such a report Herr Dr. Wurster asked me whether my parents or my wife, who after all lived in Weimar, never had mentioned anything from which might be concluded that they had been aware of the atrocities committed in Buchenwald. I truthfully told him that my parents who were living in Weimar and my wife who had been evacuated there had heard of the existence of Concentration Camp Buchenwald for the first time toward the end of August 1944 at the time of the large-scale air raid on the camp; before that they only had heard that a large, but secret armament plant had been situated there; even after the air raid my parents and my wife made no mention of the atrocities in Buchenwald.

- 3 -

4. Toward the end of May Dr. Wurster received permission to drive to the IG plant in Central Germany with a truck and a car, accompanied by an American Lieutenant from the Military Government in order to pick up several products which were required in Ludwigshafen. I myself went on this trip as interpreter. On our way there we stopped in Weimar on 30 May 1945 and shortly after midnight we reached the home of my parents. The subsequent conversation which was joined by the American lieutenant soon veered to the reports concerning Buchenwald since Herr Dr. Wurster absolutely wanted to know whether my parents or my wife could confirm the pertinent radio reports. I myself tried to change the theme of discussion since I assumed that it would excite my mother very much, who is a pacifistically inclined English woman. However, Herr Dr. Wurster's urging caused my mother to tell everything she herself had heard after the collapse concerning affairs in Buchenwald. She mentioned in passing that she had not left her house for a long time because, during that period the American and German police picked up the unbelieving population of Weimar arbitrarily on the streets to bring them to Buchenwald by force in order to convince them of the truth on the spot. This discussion in my parental home also permitted only the conclusion

DOCUMENT BOOK VI WURSTER
DOCUMENT No. 233

- 4 -

that Herr Dr. Wurster did not have any knowledge of the events in the
concentration camps before the collapse.

Ludwigshafen/Rhine, 28 January 1948

signed: Dr. Bernhard Cyriax

The above signature of Dr. Bernhard Cyriax, executed in my
presence is certified. Dr. Wolfgang Heintseler Ludwigshafen/Rhine,
Brunckstrasse 13.

Ludwigshafen/Rhine, 28 January 1948

signed: Dr. Wolfgang Heintseler
Attorney

- 21 -

Copy

Frankfurt/Main, 17 March 1948

Affidavit.

I, Karl v. Heider, Frankfurt/Main Grillparzer Strasse 83 formerly head of the business office of Sales Combine Chemicals with title of director, have been informed that I am liable to punishment for making a false affidavit. I declare in lieu of oath that my statement contains the truth and that it was made for the purpose of being submitted in evidence to the Military Tribunal No. VI in the Palace of Justice, Nuremberg, Germany.

1. I refer to my affidavit of to-day concerning the joining of IG with the Degesch and concerning the functions of the Verwaltungsausschuss of the Degesch. In connection with it I can make the following statement concerning the activity of Dr. Carl Furster within the sphere of the Verwaltungsausschuss of the Degesch:
2. In 1940 Dr. Furster was appointed to the Verwaltungsausschuss of Degesch because the IG product "Calcid" which was turned over for distribution to Degesch, belonged to the manufacturing sphere of the Ludwigshafen plant coming under Dr. Furster. Later also his contact with Degesch primarily concerned the Calcid business.
3. I know Dr. Furster personally very well because we amicably collaborated for many years. During World War II also, we telephoned each other at least 3 or 4 times a month and, in the course of these telephone calls we also discussed general matters. Thus we also talked repeatedly about the Calcid business of the Degesch since the Calcid deliveries were handled via a sales department which came within my scope. The confidential relationship between Herr Dr. Furster and myself would have made it obligatory for me to inform him under all circumstances if I would have had even the slightest suspicion that the Degesch product

- 2 -

Zyclon was being abused for mass gassing in the concentration camps. Vice versa I am also firmly convinced that Dr. Wurster would have discussed it with me openly if he would have been aware of these matters or would have had the slightest suspicion of them.

4. On the basis of the whole personality of Dr. Wurster, which is marked by a very high ethical standards based on religious conviction, I am absolutely sure that Dr. Wurster would never have given his tacit assent if he would have had even an inkling of the mass murders in the concentration camps and the use of the Degesch product Zyclon for this purpose.

signed: Karl von Heider

I certify the above signature of Karl von Heider, residing Frankfurt/Main, Grillparzer Strasse 83, executed in my presence on 17 March 1948 in Frankfurt/Main, Dr. Wolfgang Heintzeler, Attorney.

signed: Dr. Wolfgang Heintzeler
Attorney

Affidavit.

I, the undersigned Dr. Weber, pastor, of the Christ Church in Mannheim, have been informed that I expose myself to punishment if I make a false statement in lieu of oath. I declare in lieu of oath that my statement is true and was made to be presented as evidence before the Military Tribunal Court at the Palace of Justice in Nuernberg, Germany, in Case VI.

I declare herewith that on 5 May 1947 I sent an official clerical testimony to Frau Dr. Furster of my own free will and unasked, because I had heard that Dr. Furster had been arrested for and charged with Nazi tendencies. However, since Dr. Furster has been indicted by the American Military Tribunal in Nuernberg, I am again giving the content of my official clerical testimony of 5 May 1947 in the form of a statement in lieu of oath, as my judgement of Dr. Furster:

- 1.) I am a confessional pastor from Baden and was designated by the Gestapo/for confinement in the concentration camp Dachau during the Nazi regime. For this reason my ability to judge matters concerning the Nazi regime ought to be conceded.
- 2.) I knew Dr. Furster personally since the time his child was confirmed during Hitler's reign. Dr. Furster was not prevented by public disapproval from sending his child from Ludwigshafen to the discredited confessional pastor in Mannheim, so that it could be instructed in his own old belief. When I visited Dr. Furster at that time, he took his Wuertembergischer hymnal from his book shelf and assured me that it

- 2 -

always had its place of honor there and said: "Reverend, I think highly of my faith and will never deny it." Bishop Wurm was his well-trusted spiritual guide.

3.) On another occasion Dr. Wurster took part in a burial ceremony I held. At its conclusion he told me, among other things: "I was immediately glad when I saw you, because then the old gospel was going to be preached." To me that means that he rejected the attacks on the foundations of Christianity that the Nazis always attempted.

4.) Dr. Wurster sent his child to the "Elisabeth von Thaddenachule" in Wieblingen, and for the reason that he wanted to give him an emphatically Christian education.

5.) In the discussions I at times had with Dr. Wurster I never got the impression that he agreed in principle with Nazism.

Mannheim, 5 March 1948.

signed: Dr. Weber

The above signature of Dr. Weber, pastor of the Christ Church in Mannheim, is herewith certified and attested by me.

Mannheim, 5 March 1948.

Stamp:

signed: R. Moyer, pastor

Deputy Dean

Evangelical Deans Office

Mannheim

Copy

No. 344/47

Protestant Dean's Office
Ludwigshafen/Rhine

Ludwigshafen/Rhine, 26 June 1947
Brucknerstrasse 2

Telephone No. 537

Postal Savings Account No. 7345 Lu

To the French Administration
of the Badische Anilin- & Soda-Fabrik

Ludwigshafen

Subject: Direktor Dr. Wurster,

as the present leader of the local deanery I affirm that

Herr Direktor Dr. Karl WURSTER, Ludwigshafen/Rh. is known in local Protestant circles as a distinguished man with noble sentiments throughout.

Whenever the representatives of our Evangelical welfare society or our church communities came in contact with him, they could see that he possessed a complete understanding for the charitable and other interests of his Evangelical Church. There is not the slightest knowledge here that Herr Direktor Dr. Wurster ever expressed himself or acted in a National Socialistic manner during the time of the so-called 3rd Reich.

It is certain that thousands of families in our Evangelical Church communities would consider it to be a great misfortune if, through the actions of an occupation power, this extremely well informed, benevolent and beloved man were to lose his position as leader of the largest industrial concern of this city even temporarily.

~~SECRET~~ ~~TOP SECRET~~

Doc. No. 171

- 2 -

I am certain of the agreement of all Protestants of Ludwigshafen and its entire surroundings when I ask that the management of the B.A.S.F. shall continue to remain in his proved hands, especially during these critical times.

signed: O. Knecht, minister.

Seal:

Protestant Dean's Office
Ludwigshafen on the Rhine.

- 27 -

Copy.

No. 2325/47

(22b) Speyer, Domplatz 5, 26 June 1947
Telephone 2190

Protestant District Church Council
of the Palatinate,

To the French administration
of the Badische Anilin- & Soda-Fabrik

Ludwigshafen/Rhine,

Subject: Request for release of Herr Direktor Dr. Hurster.

We take the liberty of humbly requesting the French management of the Badische Anilin- & Soda-Fabrik to release Herr Direktor Dr. Hurster for the following reasons.

As a member of the Evangelical Church, Dr. Hurster not only remained faithful during its time of stress, but also showed himself at all times to ^{be} exceptionally receptive to its desires for support of its spiritual and social activities. We are not aware that Dr. Hurster abused his authoritative position in a despicable manner during the Nazi regime. On the contrary, he is described by every unprejudiced colleague and subordinate as a man with character, who made an effort to live in a manner that corresponded to his position. It shatters the faith in justice when such a person must appear before large segments of the working population as the victim of the current historical situation. Being a church, we especially desire to express this worry. Added to this there is another, that of the continued existence of the Badische Anilin- & Soda-Fabrik, to which Dr. Hurster, with his great experience and in self sacrificing service, had completely devoted his great abilities.

Since large segments of our population have derived their livelihood from the fortunate location of this great plant, we would like to maintain the social equilibrium of our working circles for the future, too, by the retention of Herr Dr. Jurster in this plant. We would be indebted to the administration if they would make these, our worries, their own and take the necessary measures to assure the success of our request for the release of Herr Dr. Jurster.

By order

signed: Kochler

Seal:

Protestant District Church Council
of the Palatinate.

Copy

Episcopal General Vicarage

Speyer, 25 June 1947

Speyer

Testimony.

We affirm and acknowledge the statement made by Prelate Martin Waiser, Ludwigshafen on the Rhine, St. Ludwig's parsonage, in his testimony of 25 June 1947. According to our personal knowledge of Herr Dr. Wurster, too, he neither was active as a National Socialist nor did he embrace their ideas. A setback or a collapse of the Badische Anilin- & Soda-Fabrik would cause increased misery for a large number of the members of our diocese, for which reason the episcopal authority is greatly interested in the continued reconstruction of this plant.

signed: Dr. Hauesner

Vicar General

Seal:

Ordinarium Episcopale-
Spirae Sigillum

Testimony.

I am in a position to make the following statement about the character and activity of Herr Dr. Carl Wurster, Direktor of the BASF in Ludwigshafen on the Rhine:

Since Herr Dr. Wurster has been active in an influential and leading position in the plant of the former I.G. and now the BASF, he has earned the trust and esteem, not only of all of the clerks, officials and workers of the plant, but also of the entire city of Ludwigshafen on the Rhine. In the critical period after the collapse of the Hitler Reich, Dr. Wurster performed valuable services for the city of Ludwigshafen on the Rhine by providing officials, workers and supplies for urgently necessary reconstruction work and to care for the population. It is the general conviction that Dr. Wurster is indispensable to the plant of the BASF at this time and for the immediate future. The plant itself is the primary economic support of Ludwigshafen on the Rhine, which could never be rebuilt without the BASF, as well as of a large part of the Palatinate and of other sections of the State of Rhineland/Palatinate. A setback, let alone a collapse, of the plant would necessarily have catastrophic economic, and therefore also moral, consequences.

For this reason both Christian churches are strongly interested in an undisturbed reconstruction of the Ludwigshafen-Opau plants. In our opinion, everything that could prevent or hurt this revival of the plants must be avoided. And therefore, it is for this very reason that we think the services of the present Direktor can hardly be dispensed with at this time.

Politically, the following is known about Herr Dr. Carl Jurster: Dr. Jurster was a member of the Party, which could hardly be avoided in his position. Everybody, however, who is familiar with conditions in Ludwigshafen, will acknowledge that Jurster was never active in the meaning of the NSDAP and never judged his employees in the plant according to whether or not they were members of the Party. The ZSK (Central Sauberungs-Kommission - Central Purgings Commission) also adopted this conception after a detailed investigation of the circumstances, and allowed Herr Dr. Jurster to remain in his position.

I take the liberty of recalling the following from my personal recollections: In the first few days after the capitulation Dr. Jurster was arrested by the American occupation authorities. The chief of the Ludwigshafen Military Government at that time, Colonel Hoover, asked me about Dr. Jurster. I informed him that the Ludwigshafen-Oppau plant under Dr. Jurster had had the best of relations with the church and its representatives and that the workers of the three groups - Christian, Social Democrats and Communists - approached Herr Dr. Jurster with confidence. The next day Dr. Jurster was set free by the American military authorities.

In his person Herr Direktor Dr. Jurster enjoys the esteem and confidence not only of the members of his plant, but of the entire citizenry of Ludwigshafen on the Rhine as well.

Ludwigshafen on the Rhine, 25 June 1947.

signed: Monsignor A. Jaiser

Monsignore Martin Jaiser, Prelate

Seal:

Copy

Affidavit.

We, the undersigned priests in Ludwigshafen/Rhine, were duly warned that we make ourselves liable to punishment by rendering a false affidavit. We declare that our statements are true and that we have been informed that they will be presented in evidence before the American Military Tribunal at the Palace of Justice in Nuernberg in Case 6.

The undersigned priests have been since 1922, 1925, 1937 and 1938 priests in Ludwigshafen/Rhine within the sphere of I.G. Farben, that is during all the time during which Karl Wurster was director of I.G. Farben plant Ludwigshafen/Rhine-Opau, resp. The present BASF (Badische Anilin and Sodafabrik).

We know that Herr Dr. Wurster has been a member of the NSDAP since 1937, after he had previously several times refused to answer the request that he join the Party.

However, as priests to whose district of spiritual care the BASF belongs we are in a position to declare that no activity of Dr. Wurster within the Party or in favor of National Socialism has become known to us. Due to our knowledge of conditions and the close contact we have with all circles of the population, particularly with labor, we should have learned of such an activity by Dr. Wurster under all circumstances, if it had been a fact. Possible violations of inferior officials of the large plant in the sense of National Socialism can not be blamed on the person of Dr. Karl Wurster.

DOCUMENT BOOK VI WURSTER
DOCUMENT No. 167

- 2 -

We wish to emphasize that Dr. Karl Wurster had the best of understanding with all groups of workers.

signed: Husse, Dean, sgd. K. Trauthwein, Minister

sgd. Eugen Kraft, Min.

sgd. Mgr. M. Walzer, sgd. Emil Pfloerchinger, Minister

The undersigned:

Dean Ludwig Husse, Minister in Ludwigshafen/Rhine Herg-Jesu, born 20
October 1890 at Speyer.

Prolet Martini Walzer, Minister in Ludwigshafen/Rhine, St. Ludwig,
born 17 May 1883 at Bueckelberg (Pfalz)

Minister Emil Pfloerchinger, Minister in Ludwigshafen/Oppau, born
2 March 1892.

Minister Karl Trauthwein, Minister in Ludwigshafen/Rhine, St. Dreifaltigkeit,
born 18 February 1897.

Minister Eugen Kraft, Minister in Ludwigshafen/Rhine - Friedenheim St.
St. Gallus, born 17 October 1909.

- 34 -

Copy

Office of the Bishop
Speyer

Speyer, 24 November 1947

S t a t e m e n t .

To the affidavit by the Catholic priests on the preceding pages we declare that we too have learned of no facts, which in any way could incriminate Herr Dr. Wurster in regard to his political or social opinion and attitude during the Nazi-regime. Any activity of Dr. Wurster in an active National Socialistic sense would certainly have become known to us, considering the importance of his person as the director of the biggest industrial concern of our diocese. This is even more true of the priests of the city of Ludwigshafen, who on the basis of their yearlong work and close contact with all groups of the population are competent to pass the conclusive judgment of the preceding pages.

Stamp:

Ordinarius-Episcopalis-
Spirensis Sigillum

signed: Dr. Haussner

General Vicar

Copy

Cath. Parrish

Limburgerhof

(Pfalz)

Limburgerhof, 10 February 1948

Affidavit.

I, the undersigned Johannes Finck, Cath. priest and doncon at Limburgerhof near Ludwigshafen, born 4 December 1888 in Hornheim, Kreis Landau, Pfalz, was instructed that a false affidavit will render me punishable and that I have to state the pure truth.

I also was informed that my statement will be presented in evidence before the American Military Tribunal at the Palace of Justice in Nuernberg in Case VI.

I declare in lieu of oath the following:

The BASF (Badische Anilin und Soda Fabrik) in Ludwigshafen has through quite considerable financial assistance made possible the construction of a Cath. church in Limburgerhof (1936/37) during the Hitler time in spite of the opposition of National Socialist circles. A representative of the management of the BASF in Lu also took part in the laying of the foundation stone ceremonies and the consecration of the church.

Furthermore has the BASF in Ludwigshafen starting from 1935 throughout the Hitler time contributed 1200,-RM a year to the newly erected Catholic nursery home and by that made possible the establishment and maintenance of the Cath. nursery home.

In addition the BASF in Ludwigshafen has upon my request made available a large amount of money yearly for assistance to poor first communicants and also

- 2 -

in other matters shown great understanding and obligingness for the needs of the parish and the ecclesiastical caritas.

signed: Johannes Finck

Priest and Dean

The above signature of the priest - Johannes Finck, Limburgerhof near Ludwigshafen/Rhine, executed before Attorney at Law Friedr. Wilh. Wagner, Ludwigshafen/Rhine, is, herewith certified and attested by me.

Ludwigshafen/Rhine, 10 February 1948

signed: F. W. Wagner

Attorney at Law

Copy

Affidavit.

I, Minister Otto Knecht, residing in Ludwigshafen/Rhein, Brucknerstrasse 2, was duly warned that I make myself punishable by rendering a false affidavit. I declare in lieu of oath that my statement is true and was made to be presented in evidence before the Military Tribunal at the Palace of Justice in Nuremberg, Germany.

1. From my work as a minister of the Protestant Church Community North and later Deputy Deacon of the city of Ludwigshafen it is known to me that the I.G. plant Ludwigshafen has for years spent large sums for charity and church purposes on a current basis. It was known that the management of this plant, especially Dr. Warster, was in this field particularly anxious to help and that Dr. Warster also personally got in touch with representatives of the church.

I know from close personal talks with Herr Dr. Warster that he stems from a christian home and stands for an absolutely positive christian faith.

2. In detail the I.G. plant has as far as I remember contributed 3- 4000 RM yearly for the care of the sick, given RM 800.- yearly to the city mission association as well as fuel to a reduced rate.

It is further known to me that boys and girls to be confirmed received every year considerable gifts.

At this occasion I wish to point out that the continuation of this charitable work and therewith the affirmation of the Christian faith under the regime of the National Socialism

DOCUMENT BOOK VI JUSTICE

DOCUMENT No. 301

- 2 -

must be very highly appreciated, since it is known that
National Socialism was opposed to these things.
Ludwigshafen/Rhine, 15 March 1948

signed: Otto Knecht,

Minister

The above signature of Minister Otto Knecht, Ludwigshafen, Bruckner-
strasse 2, executed before Attorney at Law Friedrich Wilhelm
Wagner, Ludwigshafen/Rhine, is, herewith certified and attested
by me.

Ludwigshafen/Rhine, 15 March 1948

signed: F.W. Wagner

Attorney at Law

Copy

Affidavit.

I, the undersigned Hans Morgenthau, Merchant, born on 30 March 1900 at Ludwigshafen on the Rhine, resident at Ludwigshafen, Siemensstrasse 6, having been warned that I should render myself liable to punishment by making a false affidavit, declare in lieu of oath that my statement is the truth and has been made in order to be submitted as an evidence to the Military Tribunal in the Palace of Justice, Nuremberg, for Case 6.

In 1916 I started employment with the Badische Anilin und Soda Fabrik at Ludwigshafen on the Rhine as a clerk, and was, during the time between September 1921 and the end of 1937, secretary to Geheimrat Professor Dr. Bosch; since January 1938 I have been secretary to Direktor Dr. Wurster, who became, at this time, member of the Vorstand of the I.G. Farbenindustrie Aktiengesellschaft and Betriebsfuhrer of the Ludwigshafen on the Rhine-Oppau plants.

From my co-operation with Dr. Wurster which lasted a great many years, I became acquainted with his attitude towards the Jewish race. Dr. Wurster's point of view was always, both in theory and in practice, that what mattered, was the personal value and the efficiency of the individual, regardless of his race, his religion and his party affiliations. Consequently, he also rejected antisemitism. If I had needed any proof at all for this fact, the following occurrence would have supplied me with a very conclusive one:

- 2 -

On 11 November 1938, that is, a short while after the excesses against the Jews in Germany, Dr. Wurster returned in the morning from Berlin. When I saw him in his office, he was very much excited. I asked him for the reason of his excitement, thinking that it concerned business matters. Thereupon he exploded: "It is a shame, what is being done with the Jews. I am sure it is Goebbels who is behind all that."

He could hardly be induced to calm down, and paced the room, with his hands in his trousers pockets, telling me of several devastated shops he had seen the day before in Berlin. Dr. Wurster was greatly stirred and indignant about these excesses against the Jews.

Ludwigshafen on the Rhine, 20 November 1947

signed: Hans Morgenthau

I herewith attest and certify the above signature of Herr Hans Morgenthau, executed before me, Attorney-at-law Friedrich Wilhelm Wagner, Ludwigshafen, on the Rhine.
Ludwigshafen on the Rhine, 20 November 1947

signed: F. W. Wagner

Attorney-at-Law

DOCUMENT BOOK VI WURSTER
DOCUMENT No. 112

Copy

Affidavit.

I, the undersigned Max F a l k e n b e r g, born on 8 February 1887 at Posen, resident at Mannheim, Richard Wagnerstr. 7-6 having been warned that I should render myself liable to punishment by making a false affidavit, declare in lieu of oath that my statement is the truth; I have been informed that it will be submitted as an evidence to the American Military Tribunal in the Palace of Justice in Nuernberg, Germany.

On 1 April 1921 I started employment with the Badische Anilin und Sodafabrik at Ludwigshafen on the Rhine as a government building inspector (Bauleitungsbeamter), i.e. building engineer. I am a Jew by extraction, and, to be precise, a "full Jew", according to the Nazi definition.

I made Dr. Wurster's personal acquaintance in about 1925 or 1926, and had frequent contacts with him from that time onwards. My impression of Dr. Wurster was that he behaved towards me always politely, I should even say, in a friendly way.

When, in 1933 the Nazis seized power in Germany, I was, in spite of the hardships and molestations I had to put up with outside the plant, able to continue in my service, within the plant. The plant management did not put any difficulties in my way, and this, although I had continuously to negotiate with municipal and state authorities on account of my official activity. Thus, I was able to continue in my activity in the I.G. Farben Industrie Aktiengesellschaft, plant: Badische Anilin und Sodafabrik until about July 1938, without being disturbed.

- 2 -

In July 1938 the plant management had informed me that I was, before long, to be suspended from duty with stand-by pay. Still, I was able to go on with my work in the plant until 10 November 1938. On 10 November 1938 the Nazi Party carried out throughout the whole Reich the well-known violent measures against the Jews. On this day I too was arrested as a Jew, at the instigation of the Gestapo, and sent to the Dachau concentration camp. I remained at Dachau until shortly before Christmas 1938.

The I.G. Farbenindustrie Aktiengesellschaft (Badische Anilin und Sodafabrik) paid out my whole former salary from November 1938 until 31 December 1938, although I was no longer able to work for the firm. They even sent me the salary in cash, so as to prevent the Nazi authorities from laying their hands on this money, until the Nazi authorities forced me to write to the plant that I did no longer want the money directly in cash, but rather to have it paid into my banking account. This way, the Nazi authorities had the possibility to leave me only a limited amount. During the following years, I received from the plant regularly and without break every month my stand-by pay, and that until I re-started my normal employment.

Soon after the arrival of the Allies I was able to resume my work for the Badische Anilin und Sodafabrik in the former manner.

DOCUMENT BOOK VI WÜRSTER
DOCUMENT No. 112

- 3 -

I consider it my duty to express my gratitude by acknowledging that the plant management of the Badische Anilin und Soda-fabrik, particularly also during the time when Dr. Würster was director and plant manager, has behaved towards me in such an understanding and kindly way. What I am thinking of in this regard is not even so much the material, but rather the immense moral aid that was tendered to me during this hard time on the part of the plant management, and which gave to me and my wife the strength to bear up ^{during} this time.

Ludwigshafen on the Rhine, 27 October 1947

signed: Max Falkenberg

I, Attorney-at-Law Friedrich Wilhelm Wagner, Ludwigshafen, herewith attest and certify the above signature of Herr Max Falkenberg, executed in my presence.

Ludwigshafen on the Rhine, 27 October 1947

signed: F.W. Wagner
Attorney-at-Law

DOCUMENT BOOK VI WURSTER
DOCUMENT No. 274

Copy

Affidavit.

I, Horst Jacobi, resident at Neckargemünd, Am Muehlrain 51, having been warned that I should render myself liable to punishment by giving a false affidavit, declare in lieu of oath that my statement is the truth and has been made in order to be submitted as an evidence to the Military Tribunal in the Palace of Justice Nurnberg, Germany.

On 1 December 1920 I started employment with the Badische Anilin und Sodafabrik as an architect. When, in 1938, under the pressure of the National Socialist shop council, I was compelled to discontinue my activity as an architect with the then I.G.

Farbenindustrie Aktiengesellschaft at Ludwigshafen on the Rhine, because of my non-aryan descent, I was threatened, on top of all the mental distress, by the anxiety^{of} how to get the daily bread for ^{myself} and my family; since I had now, like many a fellow sufferer in the service of other firms, to expect to lose my livelihood without previous notice, and that completely. That I was not hit by that frightful fate, I owe in particular to Dr. Carl Wurster, the then director of the plant. He left it to me, to make the choice as to my future way of support - payment of a lump sum or current payments. The latter were then granted to me without setting any time limit and to such an amount that in future

- 2 -

I was spared material worries.

Apart from that, Dr. Wurster granted my request for a loan, for the purpose of acquiring a house of my own through my aryan wife, to the most generous extent. I was given the loan to the full amount of the purchasing price of RM 20,000.- and in addition the considerable expenses required by the purchasing deed, all that, under very favorable conditions of repayment.

I should like to mention in this connection that even the expenses incurred by searching after a suitable object were taken over for payment by a remuneration paid out to me to the amount of 888 RM.-.

In the following years I was repeatedly granted considerable subsidies for the costs of operations and hospitalization I incurred, which was again due only to the directives issued by Dr. Wurster.

But one of the most pleasant experiences I enjoyed was the correct, even friendly treatment I met on all occasions both in personal contact and by way of correspondence.

Thus, one of the first visits I made after the occupation by the Americans, was my call on Dr. Wurster, in order to thank him for all he had done for me and my family since 1938.

In conclusion, I cannot help stating that I myself and my family were, by the kindness shown by Dr. Wurster

DOCUMENT BOOK VI WURSTER

DOCUMENT No. 374

- 3 -

and the understanding he thereby proved for our so infinitely difficult position (which may not always have been too easy, considering the suspicious observation by certain NSDAP circles) perhaps spared the worst fate, so that we owe him the most profound gratitude.

Neckargemünd, 27 February 1948

signed: Horst Jacobi

The above signature of Horst Jacobi, resident at Neckargemünd, Am Muehlstein 51, executed in my, the Attorney-at-Law's Friedrich Wilhelm Wagner, Ludwigshafen on the Rhine, presence, is herewith attested and certified by me.

Neckargemünd, 27 February 1948

signed: F. W. Wagner
Attorney-at-Law

Copy

Affidavit.

I, the undersigned Hans Schellenberg, Diploma Engineer, residing in Ludwigshafen/Rhine, Louschnerstrasse have been informed that I am liable to punishment if I submit a false affidavit. I declare in lieu of oath that my statement contains the truth and that it was made for the purpose of submitting it in evidence to the Military Tribunal 1 at the Palace of Justice, Wurzburg/Germany.

I am half Jewish and consequently I suffered a great deal under National Socialism. Among other things, toward the end of 1944 I was sent to a concentration camp because of my origin.

I confirm that Direktor Dr. Carl Wurster - contrary to many other colleagues - in our personal relationships, never made me feel my origin. I know that the National Socialists attempted several times to remove me from my position and from the plant. Together with Direktor Dr. Otto Ambros, Direktor Dr. Carl Wurster was able in the face of all these attempts to achieve my remaining in the plant - though in a more subordinate position, and thus he prevented my becoming unemployed. During the time I spent in the concentration camp both gentlemen saw to it that my full salary was paid to my wife and helped her both in word and deed.

- 2 -

In my personal case Direktor Dr. Carl Wurster has done everything to
alleviate the sufferings caused me by National Socialism.

Ludwigshafen/Rhine 15 October 1947.

signed: Hans Schellenberg.

I certify the above signature of Diploma Engineer Hans Schellenberg
of Ludwigshafen/Rhine executed in my presence. Dr. Wolfgang Heintzeler
Ludwigshafen/Rhine Bruckstrasse 13.

Ludwigshafen/Rhine 15 October 1947.

signed: Dr. Wolfgang Heintzeler

Attorney

Affidavit.

Copy

I, the undersigned Dr. Fritz Fried, born 3 March 1896 in Troppau (Czechoslovakia) residing in Ludwigshafen/Rhine "Olframstrasse 5, have been informed that I am liable to punishment if I submit a false affidavit. I declare that my statement corresponds to the truth and I know that it will be submitted to the American Military Tribunal at the Palace of Justice in Nuernberg for Case VI.

According to National Socialist definition I was designated and treated as half-Jew during the reign of the Nazis. My father was of Jewish origin. These facts made it rather difficult for me under the Nazi Regime. Since 1927 I am employed as chemist in Badische Anilin and Soda Fabrik, Ludwigshafen/Rhine-Oppau. The difficulties which I encountered in my work were due merely to the attitude of several of my colleagues while the plant management not only did not make it difficult for me but, as stated below, behaved in a correct and even helpful manner. I recall for instance that in 1938 when Herr Dr. Wurster was managing director, a one-family home was assigned to me, and that circles outside of the plant management protested against it because I was half Jewish.

However, notwithstanding this protest I would move into the house with my family and, insofar as that was concerned I enjoyed the protection of the plant management.

When in 1944 the persons of so-called mixed race and men who were married to Jewesses were to be transported for compulsory labor with Organisation Todt (OT), the plant management, i.e. Dr. Wurster, was looking for a way out which might spare us from this measure. He was successful so that I am convinced today that I would not have been spared compulsory labor without the helpfulness and decent attitude on the part of Dr. Wurster.

During the entire period of Nazi rule I was able to work in my profession as chemist which would not have been possible if the plant management would have been following National Socialist ideas. I know that other large enterprises other than I.G. dismissed employees who were half Jewish - that is who were in my position -, because of this fact.

Ludwigshafen/Rhine 21 October 1947.

signed: Dr. Fritz Fried

- 3 -

I certify the above signature executed in my presence of Dr. Fritz
Fried. Friedrich Wilhelm Wagner, attorney, Ludwigshafen/Rhine.
Ludwigshafen/Rhine 21 October 1947.

signed: F.W. Wagner
attorney

Affidavit.

Copy

I, the undersigned Dr. Friedrich Wilhelm Hermann Bergmann, born 29 May 1899 in Altona/Albe residing in Ludwigshafen/Rhine, Brunkstrasse 15, have been informed that I am liable to punishment if I submit a false affidavit, I declare that my statement contains the truth and I know that it will be submitted to the American Military Tribunal at the Palace of Justice in Nuremberg for Case VI.

I am employed by Badische Anilin and Soda Fabrik Ludwigshafen/Rhine-Oppau since 1926. My mother was of Jewish origin so that I was designated as half-Jew according to Nazi terminology ("person of mixed race first degree") and was treated accordingly under the Nazi regime.

I was not submitted to any measures by the plant management of Badische Anilin and Soda Fabrik. In the contrary at several occasions I found that it had protected me. One of the persons under my supervision, I heard subsequently, attempted to do me harm because of my origin. The plant management at that time in the hands of Dr. Wurster, did not listen to him and thus has preserved me from harm.

Later, in 1944, when men of Jewish origin and those who were married to Jewesses were drafted for compulsory labor with Organisation Todt (OT) by order of the Nazi regime,

the plant management, at a time when Dr. Wurster was its head, was successful in keeping me and other comrades-in-suffering from being sent to such a compulsory battalion. I am absolutely sure that I myself like many others in my position would not have escaped the fate wished upon us by the Nazis without helpful assistance at that time.
Ludwigshafen/Rhine 21 October 1947.

signed: Friedrich Bergmann

I certify the above signature of Dr. Friedrich Wilhelm Hermann Bergmann executed in my presence, Friedrich Wilhelm Wagner, attorney.
Ludwigshafen/Rhine.

Ludwigshafen/Rhine 21 October 1947.

signed: F. W. Wagner

Attorney

AFFIDAVIT.

I, the undersigned Franz SEEINHART, born 11.11.1901 in Karlsruhe/Baden, residing Ludwigshafen/Rhein, Hardstr. 24, was duly warned that I make myself liable to punishment by rendering a false affidavit. I declare in lieu of oath that my statement is true and was made to be presented in evidence before the American Military Tribunal at the Palace of Justice in Nurnberg, Case 6.

I have been employed as a graduated Engineer with the Badische Anilin- & Soda-Fabrik in Ludwigshafen/Rhein since 1st July 1929. Since February 1938 until to-day I have been working without interruptions as safety engineer at the Ludwigshafen plant and as such I was directly subordinated to Dr. Carl WURSTER. I received all my official instructions directly from him in his capacity as plant manager. My work as safety engineer consisted in creating the necessary installations to prevent accidents, to enlighten employees in regard to accident prevention and to work on all questions connected therewith.

My wife is a Jewess. From this fact considerable difficulties have arisen under the national socialist regime. These difficulties however did not originate

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. 184

with the workmanagement or with Dr. WURSTER, but with the Nazis, who were employed at the plant. The workmanagement and particularly Herr Dr. WURSTER himself have very effectively and emphatically protected me against all these attacks and kept me in my position in spite of such resistance.

So a chemist working for us complained to Herr Dr. WURSTER that I, whose wife is a Jewess, hold such an important post as that of a safety - engineer. Dr. WURSTER energetically rejected this complaint and declared that in these matters he would tolerate no interference.

At another occasion a member of the Nationalsozialist Works Council worked secretly against me because my wife is a Jewess, with the aim to remove me from my position. Herr Dr. WURSTER protected me also against this attempt to deprive me of my position because of my wife's Jewish origin and he rejected all attempts in this respect.

I am quite sure that barring Dr. WURSTER's energetic attitude I should have been removed from my position as safety engineer because of my wife's Jewish origin.

When in 1944 the Nationalsozialist regime sent men who were married to Jewish women away for forced labor within the organization Todt (O.T.), also I received the order to report to such a camp. I took this order to Dr. WURSTER in order to inform him. Herr Dr. WURSTER declared that I need not obey this order upon his own responsibility. Dr. WURSTER then obtained a deferment for half a year for me that was until May 1945, thereby the matter was practically settled. There can be no doubt that without Dr. WURSTER's interference on my behalf I could not have been spared the forced labor, which was intended for me.

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. 184

About 1940 or 1941, when the Nationalsocialists urged non-Jewish employees in leading positions who were married to Jewish women to divorce them, Dr. WURSTER duly talked to me about this and asked my opinion. I replied that a divorce is out of question.

Thereupon Dr. WURSTER said almost literally:
"Up to now I have appreciated you very much as a co-worker, but now I also think high of you as a human being."

Ludwigshafen/Rhein, 22nd October 1947

Sig. Dipl. Eng. Franz STEINHART.

Above signature of Herr Franz STEINHART was executed before me, Attorney at Law Friedrich Wilhelm WAGNER, Ludwigshafen/Rhein and is, herewith, certified and attested.

Ludwigshafen/Rhein, 22nd October 1947

Sig. F.W. WAGNER
Attorney at Law.

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. 136

AFFIDAVIT.

I, the undersigned Dr. Eng. Hermann LEUCHS, born 6 June 1894 in Munich, residing Ludwigshafen/Rhein, Hanserstr. 6b, was duly warned that I make myself liable to punishment by rendering a false affidavit. I declare that my statements are true and I know that they will be presented in evidence before the Military Tribunal at the Palace of Justice in Nuernberg, Case 6.

I have been employed as a chemist with the Badische Anilin & Soda-Fabrik, Ludwigshafen/Rhein-Opplau.

My wife is 100% Jewish. From this fact considerable difficulties resulted after the seizure of power by the Nationalsocialists in 1933. These difficulties slowly took effect also with regard to my position with the Badische Anilin- and Soda-Fabrik. It was not the management which hampered me, but my own colleagues. To the contrary, the management neither personally nor officially took any exception to the fact that I was married to a 100% Jewess, it even protected me to the best of ^{its} ability when the difficulties became serious. When because of a denouncement by an employee from Frankfurt/Main, I was forced to withdraw somewhat from the public view, this was made very easy for me on the part of the management, although I could not be productive for years I was without ado continued on the payroll.

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. 136

In January 1944 an order was issued by the Nationalsocialists that the men who were married to Jewish women should be transported into a penal camp. When Dr. WURSTER learned of this, he had me and my other colleagues who were in the same position warned and showed us a way out by which we could at first escape arrest. While the other colleagues followed his advice, I decided to disappear from Ludwigshafen and to hide in Berlin where nobody knew me. Herr Dr. WURSTER granted me full freedom to do everything that I considered right in the interest of my wife and myself and he agreed that I should hide in Berlin. I then went to Berlin where I stayed until 1946.

Although throughout this time I did not work for the factory at all, my salary was currently credited to my banking account to the full amount.

Ludwigshafen/Rhein, 21st Oct. 1947

Sig. Dr. Ing. Hermann LEUCHS.

Above signature of Herr Dr. Hermann LEUCHS was executed before me, Attorney at Law Friedrich Wilhelm WAGNER, Ludwigshafen/Rhein, Schiesshausstr. 32 and is, herewith, certified and attested.

Ludwigshafen/Rhein, 21st Oct. 1947

Sig. F. W. WAGNER
Attorney at Law.

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. 121

AFFIDAVIT.

I, the undersigned Dr. Max HERBST, born 17 May 1892 in Vienna, residing Heidelberg; Mittlerer Geisberg No. 2, was duly warned that I make myself liable to punishment by rendering a false affidavit.

I declare in lieu of oath that my statement is true and I understand that it will be presented in evidence before the American Military Tribunal at the Palace of Justice in Nuernberg, Case 6.

I have been employed as a chemist with the Badische Anilin- und Soda-Fabrik, Ludwigshafen/Rhein-Oppau.

My wife is 100% Jewish. This fact has, after the Nationalsocialists seized power in 1933, caused my family very many troubles and at times made us suffer a great deal. In my position with the Badische Anilin- und Soda-Fabrik, I was subjected to no disciplinary action whatsoever on the part of the management and just as before I was treated correctly and courteously.

In 1944 all the so-called "mongrels" and "Jewish-mixed", that is those men, whose wives were Jewesses, were assigned to forced labor in the organization TODT (OT) by the "Nazi-chiefs". The workmanagement in Ludwigshafen, which was headed by Dr. WURSTER, tried to protect those hit by this measure and also was, successful with this.

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. 121.

There is no doubt in my mind that barring Dr. WURSTER's benevolent conduct I would also have been sent to these penal battalions.

Ludwigshafen/Rhein, 21st October 1947.

Sig. Dr. Max HERBST.

Above signature of Herr Dr. Max HERBST was executed before me, Attorney at Law, Friedrich Wilhelm WAGNER, Ludwigshafen/Rhein and is, herewith, certified and attested.

Ludwigshafen/Rhein, 21st October 1947

Sig. F.W. WAGNER
Attorney at Law.

AFFIDAVIT.

I, the undersigned, Ernst KELLER, born 6 March 1908 in Ludwigshafen on the Rhine, living in Ludwigshafen on the Rhine, Brunckstr. 57, have been informed that I expose myself to punishment if I make a false statement in lieu of oath, that I must tell the truth and that my statement in lieu of oath shall be used as evidence before the American Military Court in Nuernberg in Case VI.

I started working for the Ludwigshafen on the Rhine plant of the former I.G. Farbenindustrie A.G. on 28 Jan. 1927. After working continuously since Nov. 1935 in the nitrogen department of the Oppau plants on personnel matters and being in charge of the office handling labor matters for the entire Oppau plant after the capitulation, I was transferred on 1 July 1946 to the Personnel Department for familiarization with the various sub-departments. On 1 Jan. 1947 I was appointed by the plant management as head of Personnel Section III (Matters pertaining to university graduates).

From my work I learned that Direktor Dr. WURSTER had a very special social sensitivity for the German as well as the foreign members of the firm. In this connection I would like to refer to the appeals made at that time, in which the plant management requested contributions of clothes for the benefit of the foreign workers. In the same manner the employees of the plant were always helped by our welfare organization without regard to their political beliefs. I know of cases where Dr. WURSTER, after air raids, offered his own personal help to the victims.

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. W252

However, the help that the Jews, the so-called half Jews and the German employees married to Jewesses received from the plant management, i.e. through Direktor Dr. WURSTER, in spite of the constant pressure from the National Socialist authorities at that time, deserves to be especially emphasized. For instance, the plant management of that time managed to save those persons who would have been sent to work in the Organization TODT etc. as a result of directives from Berlin.

On the basis of available records I have prepared a chart which is appended to this affidavit. On this chart I have first listed the Jewish employees who worked in our plant during the Hitler period, according to their position, and the beginning and ending dates of their employment. In the last column I have shown their salaries and the statistics of their pay changes in detail. This chart further contains a list of the so-called half Jews and employees married to Jews who worked for the plant in Hitler's time. All three categories are shown on the chart according to the same system. From the last column "Payments and Salary Development" you can in each case see that the employees listed on the chart continued to receive payments despite the fact that they were no longer active and had left the firm, and that the employees who remained with the plant were given salary increases in spite of the fact that they were not allowed promotions.

DOCUMENT BOOK 6 WURSTER
WURSTER-DOCUMENT No. W 252

The plant management, under the leadership of Dr. WURSTER, treated the above mentioned persons very generously in spite of the dangers connected therewith, even though they could have discharged all of their obligations, even without taking advantage of National Socialist decrees, by paying the 6 months notice required by the contracts.

I was never a member of the NSDAP or of any of its organizations.

Ludwigshafen on the Rhine, 13 Dec. 1947

signed Ernst KELLER.

The signature of Herr Ernst KELLER was executed today before me, which I herewith acknowledge and attest.

Ludwigshafen on the Rhine, 13 Dec. 1947

signed P.W. TACHER
Attorney

Enclosures.

Personnel Section III

Ludwig on the Rhine

13 Dec. 1947/S.

J.S.S.

name:	D to of Birth:	Profession:	St rted:	Termin ted:	Payments and Salary Development:
FRANKENBERG, J. X	8 Aug. 1887	Gov't architect	1 Apr. 1931	31 Dec. 1938	1 Jan. 39-31 Dec. 1939 total compensation RM. 17,378.-- 1 Jan. 40-31 Dec. 40 RM. 10,104.-- 1 Jan. 42-for room- element-per for RM. 5,520.-- 15 May 1945 16 Jan. 1923 10 Aug. 1938 Full pay until 31. Dec. 39 Jan. 39 Special bonus* 2,956.-- Special payment RM. 1,950.-- July 40 RM. 1,950.-- Termination - ment* 10,000.--
FRANKENBURGER, Dr. 7 Sept. 1893 Chemist Editor,					
SCHWARTZ, Dr. Ernst,	30 June 1884	Chemist	1 Jan. 1913	30 June 1934	1934 RM. 55,000.-- 1935 RM. 31,750.-- 1936 RM. 15,000.-- 1937 RM. 15,000.-- 1938 RM. 15,000.-- 1939 RM. 15,000.-- 1940 RM. 15,000.-- 1941 RM. 15,000.--

Personnel Section III

Ludwigshafen on the Rhine
 13 Dec. 1947/S.
 J.S.S.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
FRIEDRICH, L. X.	8. Aug. 1887	Gov't architect	1 Apr. 1921	31. Dec. 1938	1. Jan. 39-31. Dec. 1939 total compensation RM. 17.378. 1. Jan. 40-31. Dec. 40 RM. 10.104. 1. Jan. 41 for room- placement-per year RM. 5.520. 18. May 1943 Resumption of work per year RM. 15.740.
FRIEDRICH, L. X., Dr.	7. Sept. 1893	Chemist Editor,	16. Jan. 1923	10. Aug. 1939	Full salary until 31. Dec. 39 Jan. 39 Special bonus " 2.936. Special payment RM. 1.950. July 40 RM. 1.950. Termination payment " 10.000.
SCHNEIDER, Dr. Ernst,	30. June 1884	Chemist	1. Jan. 1910	30. June 1934	1934 RM. 55.000. 1935 RM. 21.750. 1936 RM. 15.000. 1937 RM. 15.000. 1938 RM. 15.000. 1939 RM. 15.000. 1940 RM. 15.000. 1941 RM. 15.000.

Personnel Section III

Ludwigshafen on the Rhine
13 Dec. 1947/S.-
J.L.S.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
STAIN, Dr. Berthold	15.8.1894	Chemist	1.10.1929	31.12.1938	1939 Forbearance Payment RM. 19.848.-- Special Payment RM. 4.100.-- Special Compensation RM. 828.-- Inventors Bonus RM. 10.000.-- 1940 Forbearance Payment RM. 19.848.-- 1941 Forbearance Payment up to 30. nov. 41 RM. 22.737.--
VALLK, Dr. Emmerich	1.9.1902	Chemist	20. 6. 1929	31.12.1938	1939 Forbearance Payment RM. 6.774.-- Special Payment RM. 3.400.-- 1940 Forbearance Payment RM. 2.292.-- 1941 Forbearance Payment up to 30.11. 1941 RM. 4.686.--

Personnel Section III

Ludwigshafen on the Rhine
 13 Dec. 1947/S.-
 J.S.S.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
WOLFF, Dr. Hans II	25.12.1899	Chemist	1.1.1929	31.5.1938	Full compensation until the end of May 1938 June 1938 Special Payment RM. 1.500.-- Special Payment (once) RM. 3.000.--
WOLFF, Dr. J. Iker	16. 7.1891	Chemist	1.9.1928	31.12.1939	RM 13.828.-- Special Payment RM. 1.500.-- RM 12.828.-- Inventor's Bonus RM. 5.000.-- RM 13.370.-- until 30 Oct.

Personnel Section III

Ludwigshafen on the Rhine
13 Dec. 1947/S.

JES.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
JACOB, Horst	18.11.91	Technician	1.12.1920	31.12.1938	Salary up to 31.12.38 per annum RM. 7.080.-- Stand by Payments 1939* totalled " 7.080.-- Stand by Payments 1940 totalled " 5.000.-- Stand by Payments 1941 totalled " 5.880.-- Stand by Payments 1942* 5.370.-- Stand by Payments 1943* 5.400.-- Stand by Payments 1944* 5.400.-- Stand by Payments 1945* 8.550.-- totalled Besides this, a loan of RM. 21.500.-- to buy a home.

HALF 5503.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
DOMM, Jr.	4.11.1902	Chemist	1.12.1926	31.12.1946	1933 RM. 8.852.-- 1934 RM. 9.552.-- 1935 RM. 10.552.-- 1936 RM. 11.052.-- 1937 RM. 12.460.-- 1938 RM. 13.460.-- 1939 RM. 14.250.-- 1940 RM. 15.360.-- 1941 RM. 16.360.-- 1942 RM. 17.660.-- 1943 RM. 18.560.-- 1944 RM. 19.960.-- 1945 RM. 19.960.-- 1946 Inventor's Bonus RM. 5.000.-- 1939 Forbearance Payment RM. 3.798.-- 1940 Forbearance Payment RM. 5.054.-- 1941 Forbearance Payment until 31.3. 1941 RM. 1.286.-- 31.3.1939 transfer to Firma St. Ludwig Wilhelm BECKHOFF, Wiesbaden.
BRICH, Dr.	7. 4.1907	Chemist	1.4.35	31. 3.1939	

HALFUS, E.

NAME:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
JAMES, Dr. Fritz	3.3.1896	Chemist	1. 1. 37		1933 RM. 7.852.-- 1934 RM. 8.552.-- 1935 RM. 9.352.-- 1936 RM. 10.352.-- 1937 RM. 11.440.-- 1938 RM. 12.240.-- 1939 RM. 13.280.-- 1940 RM. 13.920.-- 1941 RM. 14.720.-- 1942 RM. 15.220.-- 1943 RM. 15.920.-- 1944 RM. 16.480.-- 1945 RM. 16.720.-- 1946 Inventor's Bonus 1933 RM. 17.500.-- 1934 RM. 17.220.-- 1935 RM. 17.220.-- 1936 RM. 17.220.-- 1937 RM. 17.908.-- 1938 RM. 18.634.-- 1939 RM. 19.164.-- 1940 RM. 19.664.-- 1941 RM. 20.364.-- 1942 RM. 20.764.-- 1943 RM. 21.164.-- 1944 RM. 21.564.--
HARRDEGEN, Dr. Kurt	37.10.1890	Chemist	15.8.1915		

WALFJES.

Names	Date of Birth	Profession	Start date	Termination date	Comments and Salary Development
GEBELER, Hans	20.10.01	Assistant	1.1.1937		1933 RM. 11.620.--
					1934 RM. 12.270.--
					1935 RM. 12.770.--
					1936 RM. 13.270.--
					1937 RM. 13.794.--
					1938 RM. 14.094.--
					1939 RM. 14.594.--
					1940 RM. 14.944.--
					1941 RM. 15.324.--
					1942 RM. 15.824.--
					1943 RM. 16.124.--
					1944 RM. 16.724.--
					1945 RM. 16.724.--
WILHELM, Dr.	22.7.12	Chemist	1.1.1938	31.1.1942	Full compensation until 31.1.1942
Wilhelm					transfer to Wolfen RM. 8.680.--

Married to Jewesses.

Name	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
ASCHENBRIKER, Dr. Michael	8.7.1900	Chemist	1.8.27		1933 RM. 5.333.--- 1934 RM. 7.035.--- 1935 RM. 8.535.--- 1936 RM. 9.535.--- 1937 RM. 11.175.--- 1938 RM. 12.175.--- 1939 RM. 13.015.--- 1940 RM. 13.815.--- 1941 RM. 14.515.--- 1942 RM. 15.395.--- 1943 RM. 15.996.--- 1944 RM. 16.596.--- 1945 RM. 16.696.--- 1942 Inventor's Bonus RM. 600.---
BERGMAN, Dr., Friedr.	29.5.1899	Physicist	1.9.25		1933 RM. 8.532.--- 1934 RM. 9.032.--- 1935 RM. 9.532.--- 1936 RM. 10.332.--- 1937 RM. 11.032.--- 1938 RM. 12.332.--- 1939 RM. 13.312.--- 1940 RM. 14.312.--- 1941 RM. 14.712.--- 1942 RM. 15.512.--- 1943 RM. 16.112.--- 1943 Inventor's Bonus RM. 800.---

Married to Jowesses.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
HERBST Dr., Alex	17.5.1892	Chemist	1.1.1928		1933 RM. 10.088.--
					1934 RM. 10.588.--
					1935 RM. 10.588.--
					1936 RM. 11.088.--
					1937 RM. 12.300.--
					1938 RM. 13.200.--
					1939 RM. 14.040.--
					1940 RM. 14.720.--
					1941 RM. 15.280.--
					1942 RM. 15.720.--
					1943 RM. 15.320.--
					1944 RM. 15.720.--
					1945 RM. 15.720.--
					1938 RM. 20.000.--
					1939 RM. 23.303.20
KU, Z, Dr. Alex	18.2.76	Chemist	1.6.1901	31.12.1938	1940 RM. 23.303.20
					1941 RM. 23.303.20
					1942 RM. 23.303.20
					1943 RM. 23.303.20
					1944 RM. 23.303.20
					1945 RM. 17.477.40 x)

x) Note: Of this sum RM. 13.821.54 still remains in Dr. KU, Z' deposit account with us.

DOCUMENT BOOK 6 JURISTEN
JURISTEN-DOCUMENT No. 1252

Married to Jewesses.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Payments and Salary Development:
LEUCKE, Dr. Herm.	5. June 1894	Chemist	1 March 1927	1933	RM. 9.485.--
				1934	RM. 10.286.--
				1935	RM. 10.893.--
				1936	RM. 11.465.--
				1937	RM. 12.616.--
				1938	RM. 13.416.--
				1939	RM. 14.204.--
				1940	RM. 14.804.--
				1941	RM. 15.404.--
				1942	RM. 15.904.--
				1943	RM. 15.804.--
				1944	RM. 16.204.--
				1945	RM. 16.204.--
				1948	Inventor's Bonus RM. 500.--
SCHMITT Dr. ,Karl Otto	2. June 1900	Chemist	1. Febr. 1925	1933	RM. 8.455.--
				1934	RM. 10.256.--
				1935	RM. 11.056.--
				1936	RM. 11.856.--
				1937	RM. 13.212.--
				1938	RM. 14.212.--
				1939	RM. 14.912.--
				1940	RM. 15.512.--
				1941	RM. 16.012.--
				1942	RM. 16.612.--
				1943	RM. 16.612.--
				1944	RM. 17.212.--
				1945	RM. 17.212.--
				1948	Inventor's Bonus RM. 500.--

DOCUMENT BOOK 6 REGISTER
 REGISTER DOCUMENT No. 2352

M.ried to Jonasses.

Name:	Date of Birth:	Profession:	Started:	Terminated:	Percentages and Salary Development:
SCHUBERT Dr., Curt	3 Sept. 1892	Chemist	1 Mar. 1932		1933 RM. 11.876.-- 1934 RM. 12.676.-- 1935 RM. 13.076.-- 1936 RM. 11.576.-- 1937 RM. 10.052.-- 1938 RM. 17.052.-- 1939 RM. 18.632.-- 1940 RM. 18.752.-- 1941 RM. 20.832.-- 1942 RM. 21.832.-- 1943 RM. 22.322.-- 1944 RM. 22.832.-- 1945 RM. 22.832.-- 1942 Inven- tor's Bonus 1.800.--
STERN, Dr. Franz	11 Nov. 1901	Engineer	1 July 1929		1933 RM. 7.498.-- 1934 RM. 8.538.-- 1935 RM. 9.538.-- 1936 RM. 10.298.-- 1937 RM. 11.298.-- 1938 RM. 12.298.-- 1939 RM. 13.348.-- 1940 RM. 14.048.-- 1941 RM. 15.828.-- 1942 RM. 16.428.-- 1943 RM. 16.428.-- 1944 RM. 16.428.-- 1945 RM. 16.428.--

Cow

Affidavit.

I, the undersigned Dr. Fritz Holsberger, born 7 June 1889 in
Grossen/Upper Franconia, residing in Ludwigshafen/Rhine
Leopold Strasse I have been informed that I am liable to
punishment if I submit a false affidavit. I declare that my
statement contains the truth and I know that it is made for
the purpose of being submitted to the American Military
Tribunal at the Palace of Justice in Nurnberg, for Case VI.

I am employed as chemist with the Badische Anilin und Soda Fabrik
since 1924. I am acquainted with Dr. Carl Wurster since about
1925. I always considered him^a frank, honest person whose
refreshing manner quickly gains for him the sympathies of his co-
workers.

Since 1945 I am a member of the shop council of Badische Anilin

und Soda Fabrik representing the university graduates. Beginning with
September 1945/

/I was the chairman of the Denazification Commission appointed by the
French administration of our plant and, since February 1946 I am
the chairman of the political screening committee for
denazification of the plant Ludwigshafen/Rhine.

Under these circumstances I do not need to emphasize that I was
not a member of the NSDAP.

DOCUMENT BOOK VI WURSTER

DOCUMENT No. 129

- 2 -

Based on my knowledge of the personality and on my experiences within this sphere I am quite sure that Dr. Carl Wurster never was intrinsically a National Socialist. This conviction of mine is reinforced by my having been a witness of derogatory comments made by Dr. Wurster concerning the National Socialists while these still were in the saddle. There can not be any doubt that Dr. Wurster had an inimical attitude toward any warlike enterprises, particularly toward aggressive warfare. His calm and clear judgment of affairs would make him realize that such a war would disturb the quiet economic development of the plant.

I wish to emphasize that the plant management never made any difficulties for me though I never was a member of the National Socialist Party and that I received my regular salary increases without any difficulties.

Ludwigshafen/Rhine, 21 October 1947

signed: Dr. Fritz Holbenger

I certify the above signature of Dr. Fritz Holbenger, executed in my presence, Friedrich Wilhelm Wagner, Ludwigshafen/Rhine.

Ludwigshafen/Rhine, 21 October 1947

signed: F. W. Wagner
Attorney

- 77 -

Copy

Affidavit.

1. I, the undersigned Dr. Fritz Holberger, born 7 June 1882, Chemist with the Badische Anilin and Soda Fabrik, residing in Ludwigshafen/Rhine, Leopoldstrasse 1 have been informed that I am liable to punishment if I submit a false affidavit. I declare in lieu of oath that my statement contains the truth and that it was made for the purpose of being submitted to the Military Tribunal at the Palace of Justice in Karlsruhe, Germany for Case VI.

2. The undersigned Dr. Fritz Holberger was chairman of the Investigating committee of the Central Purgings Commission with the Oberregierungspraesidium Ressen/Palatinate, Neustadt/Haardt.

3. In consequence of the position delineated under 2) I am fully aware of the political attitude and activity of the staff of the plant of Badische Anilin and Soda Fabrik Ludwigshafen-Opau (formerly IG Farbenindustrie Aktiengesellschaft, Plants Badische Anilin und Soda Fabrik).

4. On the basis of my knowledge of affairs I declare that from 1938 to 1945 there was only one Party member (membership 1937 and without rank) among all the department chiefs (direktors and prokurists) of all production departments of the IG plant Ludwigshafen-Opau including the technical department with energy production.

- 2 -

5. According to data established by me the personnel in the IG plant Ludwigshafen-Opau comprised 28 599 persons as per 1 January 1941. 22 511 persons i.e. ca. 80% of the entire personnel were employed in the production departments which were subordinate to the department chiefs (direktors and procurists) mentioned under 4..

6. Because the most important executive positions were filled in the manner shown under 4. and 5. a pronounced liberal-political atmosphere prevailed in the IG plant Ludwigshafen-Opau in as far as such was possible until under Nazi rule.

As far as I know the plant management never exerted even the slightest pressure to make the personnel join the National Socialist Party. It could not be noticed that employees who were not members of the Nazi Party or its organizations, were at any disadvantage.

Ludwigshafen-Rhine, 3 March 1946

signed: Dr. Holzberger

I certify the above signature by Dr. Fritz Holzberger executed in my presence. F. W. Wagner, attorney, Ludwigshafen/Rhine

Schlosshausstrasse 32.

Ludwigshafen/Rhine, 3 March 1946

signed: F. W. Wagner
Attorney

Copy

Affidavit.

I, the undersigned Ernst L o r e n z, born 13 March 1901 in Ludwigshafen/Rhine-Oggersheim, residing in Ludwigshafen/Rhine-Oggersheim, Jahnstrasse 14, have been informed that I am liable to punishment if I make a false affidavit. I declare that the statement contains the truth and that I know that it will be submitted in evidence to the American Military Tribunal at the Palace of Justice in Nuernberg, for Case VI.

Since 1920 I am a metal worker with Badische Anilin und Soda Fabrik in Ludwigshafen/Rhine. Since 1938 I am working as assistant foreman in the gumming shop of the plant. Since 1945 I am the chairman of the shop council of Badische Anilin und Soda Fabrik. In addition I am:

Member of the Diet for the Rhineland/Palatinate as the Social Democratic Party Deputy

Chairman of the Land Association of the Chemical Industry Rhineland/Palatinate

Member of the Bund Vorstand of the General Trade Union Bund for the Rhineland/Palatinate and

Member of the Inter Zonal Commission of the Union.

I met Director Dr. Carl Wurster for the first time when he took over the plant management in 1938. At that time he made a speech which I found remarkable for that period because he emphasized

- 2 -

the human and social side. In the course of several short visits of Dr. Wurster to my shop I had the occasion to have some brief talks with him. I found Dr. Wurster to be a remarkable personality with progressive ideas which I found to be most agreeable.

In 1943 I attended a psychological training course for foremen in our recreation home at Kehlhof near Heidelberg. During this course Dr. Wurster paid us a visit and entertainingly talked to us concerning the situation of the plant and similar matters. I liked him still more than before at this occasion because he was a passionate opponent to war, because he described war as insanity the consequences of which could not be successful for the chemical industry. In the course of the subsequent informal discussion Dr. Wurster was asked a political question the answer to which in Dr. Wurster's case might have produced conflict between him and the Nazi Party. He avoided answering the question by stating, while making an ironical hand motion "I do not know anything of politics. That is Herr Rittaler's province." Rittaler was the chairman of the shop council appointed by the National Socialist Party,

DOCUMENT BOOK VI WÜRSTEN
DOCUMENT No. 137

- 3 -

equipped with extensive political powers by the Party which
he applied to their full extent,

Ludwigshafen/Rhine, 6 November 1947

signed: Ernst Lorenz

I certify the above signature of Herr Ernst Lorenz, executed
in my presence, Friedrich Wilhelm Wagner, attorney Ludwigshafen/
Rhine.

Ludwigshafen/Rhine, 6 November 1947

signed: F.W. Wagner

Attorney

Affidavit.

I, the undersigned Paul Fischer, born 1 February 1902 in Ludwigshafen/Rhine, residing in Ludwigshafen/Rhine have been informed that I am liable to punishment if I make a false affidavit. I declare that my statement contains the truth and that I know that it will be submitted in evidence to the American Military Tribunal at the Palace of Justice in Nuremberg for Case VI.

Up to the dissolution by the National Socialist government in 1934

I was

Chairman of the Winthorst Bunde of the Palatinate

Deputy chairman of the Winthorst Bunde of Germany

Member of the Reich Party Leadership of the German Centrist Party

Kreis Warden for games of the German Youth Association Palatinate and for South West Germany.

All the above-mentioned organisations were Catholic organisations.

The National Socialists considered these organisations of active Catholicism their enemies from the very beginning and consequently fought against them. This fight also extended against the practicing Catholics and, in particular against the leaders of these organisations. In my capacity as leader of such Catholic organisations I had to experience several house searches during 1933 and 1934.

- 2 -

In 1939 I applied for a position with Badische Anilin und Soda Fabrik in Ludwigshafen/Rhine, who, according to their custom, checked my references. After a discussion with Herr Dr. Murster which showed that he was thoroughly aware of my past and my active Catholicism, I nevertheless was employed as clerk on 1 July 1939. On 1 January 1943 I was promoted to manager of the clothing plant of the Badische Anilin und Soda Fabrik by special agreement of Dr. Murster. The National Socialist shop council protested to Dr. Murster against my promotion to manager pointing to the lack of confidence in me by the National Socialists due to my activity in Catholic associations and the fact that I had been cautioned on 1 February 1940 by the shop council because of my political attitude.

Dr. Murster rejected this protest as unjustified and declared that he was filling positions not according to the political conviction but according to the efficiency of the applicants.

My promotion was possible only because of the energetic attitude of Dr. Murster relative to the National Socialists in the plant. There is no doubt as far as I am concerned that Dr. Murster, as shown by his actions in my individual case but

434

also by his over-all attitude, was not intrinsically a National Socialist.

Since 1945 I am a member of the shop council of Badische Anilin und Soda Fabrik, Ludwigshafen/Rhine as the representative of the Christian group among the clerical employees.

Ludwigshafen/Rhine 22 October 1947.

signed: Fischer Paul

I certify the above signature of Herr Paul Fischer which was executed in my presence, Friedrich Wilhelm Wagner, Ludwigshafen/Rhine 22 October 1947.

signed: F.W. Wagner

Attorney

Copy.

Affidavit.

I, the undersigned Rudolf F r e n z e l, born 5 August 1901 in Ludwigshafen/Rhine and residing in Ludwigshafen/Rhine Ebertstrasse 23, have been informed that I am liable to punishment if I submit a false affidavit. I declare that my statement contains the truth and that I know that it will be submitted in evidence to the American Military Tribunal at the Palace of Justice in Nuremberg for Case VI.

I again joined the Badische Anilin und Soda-Fabrik Ludwigshafen/Rhine in 1934 and since that time I have been employed there without interruption.

First I was employed as plant technician with the Technical Department in the Ludwigshafen plant, Electro Section. Then I was made electro-engineer and in 1943 I became the independent manager of the Electrical Section.

My political activity before the seizure of power by the National Socialists had caused me to be known as a member of the Communist Party. Notwithstanding, I was appointed independent manager in 1943 when Dr. Jurster was the director and manager of the plant Ludwigshafen/Oppau.

No doubt prevails that Dr. Murster knew that I was a Communist when I became manager. Dr. Murster, when employing or promoting laborers or employees was not motivated by their political conviction but by their adaptability and efficiency in the plant.

I especially recall one incident. At some occasion or other, while Dr. Murster had been plant manager, the National Socialist shop steward of the plant addressed a large employees' meeting. This National Socialist explained the great progress made by chemistry under Adolf Hitler. Subsequent to the speech by this National Socialist Dr. Murster spoke. He very clearly stated that chemical science had been working on the great problems to be solved for many years and even previous to Adolf Hitler. I was particularly satisfied by this talk of Dr. Murster because I was an opponent of National Socialism ^{and} because in hardly veiled words it meant a slap in the face for the National Socialist speaker. At that time I already gained the impression that Dr. Murster intrinsically was not a National Socialist.

In 1945 I became a member of the shop council and, in this capacity I had closer contact with Dr. Murster. I have gained the firm conviction

- 3 -

that Dr. Murster is a progressive, democratic and social-thinking person, who cares deeply for the welfare of his workers and employees and beyond that, of the total population. The confidence which I, as shop council representative have in him is so great that I was ready to omit any written agreement concerning a plant agreement because I was sure that he would regulate matters concerning the plant in such a manner that it will be in the interest of all employees.

The degree of confidence enjoyed by Dr. Murster with the large majority of the staff of the plants Ludwigshafen and Oppau was expressed particularly clearly when the plant employees left their place of work an hour sooner in a spontaneous sympathy strike when it had become known that Dr. Murster had been taken to Durenburg from the Ludwigshafen hospital by the American authorities.

Ludwigshafen/Rhine 21 October 1947

Signed: R. Frenzel

- 4 -

The above signature of Herr Rudolf Frenzel was executed in my presence and is certified herewith. Friedrich Wilhelm Wagner, Attorney, Ludwigshafen/Rhine.

Ludwigshafen/Rhine 21 October 1947.

signed: F.W. Wagner

Attorney

Copy.

Affidavit.

I, the undersigned Otto Eckert, born 27 December 1889 in Germersheim/
Palatinate, residing in Heidelberg, Kaiserstr. 41, was duly warned that
I make myself liable to punishment by rendering a false affidavit. I
declare that my statement is true and was made to be presented in
evidence before the American Military Tribunal at the Palace of Justice
in Nurnberg, Case 8.

I have been employed with the Badische Anilin- und Soda-Fabrik in
Ludwigshafen/Rhine since 1st July 1911. Since 1919 I was employed as
a labor relations expert and since 1938 I have been director of the
Personnel Department for workers with the Badische Anilin- & Soda-Fabrik.

I have never been a member of the National Socialist Party or
any of its subdivisions; I am an active Catholic. Although Dr. Jurster
knew these facts he not only kept me in office as labor relations ex-
pert, but even appointed me director of the Personnel Department for
workers. For natural reasons the National Socialists had the greatest
interest to fill this position with a National Socialist, for all
matters connected with labor relations belonged to the tasks of the
director of the labor-relations-Department like hiring, discharge,
payroll, vacations and the handling of all requests and complaints.
The demand of the National Socialists to remove me from this post as

* * *

an enemy of National Socialism was continuously resisted by Dr. Jurster and he kept me in this position, in which I am still to-day, throughout the Nazi-regime.

Ludwigshafen/Rhine, 20 October 1947.

Signed: Otto Sekert

Above signature of Herr Otto Sekert executed before me, Attorney at Law Friedrich Wilhelm Wagner, Ludwigshafen/Rhine, Schiesshausstr. 32, is, herewith, certified and attested.

Ludwigshafen/Rhine, 20 October 1947.

Signed: F.W. Wagner

Attorney at Law.

Copy.Affidavit.

I, the undersigned Erich Dwy, born 23 January 1894 in Lingonfeld/Palatinate, residing Lingonfeld/Palatinate, Altpayerstr. 7, was duly warned that I make myself liable to punishment by rendering a false affidavit. I declare that my statement is true and I understand that it will be presented in evidence before the American Military Tribunal at the Palace of Justice in Kuerenberg in Case 6.

I have been employed with the Badische Anilin- und Soda-Fabrik in Ludwigshafen/Rhine since 1922, at first as a commercial employee and then as director of the calculation department. I never was a member of the National Socialist Party or any of its sub-divisions, for as an active Catholic I was apposed to the Nazi-movement. It is quite natural that the National Socialists knowing my attitude should have felt unfriendly towards me. Herr Dr. Wurster was in no way bothered about that, but treated me just as many other faithful Catholics in the most objective and just manner. He did not judge his employees according to their affiliation as members of the NSDAP, but according to their ability as individuals. Although we Catholics were subjected to persecutions and insults by the National Socialists and were strongly opposed by them in the plant, Dr. Wurster never succumbed to their pressure in this direction.

- 8 -

Not only could I remain in my position but also received regularly the salary increases customary then. What I can say about myself is also true of others. For instance, at the time the position of director of the factory accounting office, which had a staff of 320 employees, became vacant because of pensioning, Dr. Wurster appointed a man of whom he knew that he was an enemy of the National Socialists. None of the leading gentlemen within the factory accounting office belonged to the NSDAP and still they all could remain in service. Dr. Wurster kept his protective hand over all of them.

This is also true of still another case, which I also know personally. In 1938 Herr Dr. Wurster hired for the Badische Anilin- und Soda-Fabrik a man who had been active in the Catholic youth-movement as a leader and who had been disciplined at another job because of his non-National Socialist conviction and in 1943 even promoted him to director of the traffic-department.

From the above related facts as well as on the basis of my other observations I am with many other co-workers firmly convinced that Herr Dr. Wurster in his heart has never been a National Socialist.

Ludwigshafen/Rhine, 20 October 1947.

Signed: Erich Day

- 3 -

Above signature of Herr Erich Day executed before me, Attorney at Law
Friedrich Wilhelm Wagner, Ludwigshafen/Rhine, Schliesshausstr. 32, is,
herewith, certified and attested.
Ludwigshafen/Rhine, 20 October 1947.

Signed: F. W. Wagner
Attorney at Law.

Copy.

Affidavit.

I, the undersigned Johannes Thoma, born 18 August 1892 in St. Louis, Missouri, USA, residing in Ludwigshafen/Rhine, I Gartenweg 41 c, was duly warned that I make myself liable to punishment by rendering a false affidavit. I declare that my statements are true and was instructed that they will be presented in evidence before the American Military Tribunal at the Palace of Justice in Nuernberg, Case 5.

I have been employed with the Badische Anilin- & Soda-Fabrik, Ludwigshafen/Rhine since 1922 up to this day without any interruptions. At first I worked in the laboratory and now I am foreman in the inorganic department of the factory.

Dr. Carl Jurster entered as a young Chemist about 1924 the department of our factory, in which I at that time worked as a laboratory assistant. He at once revealed himself as an extraordinarily industrious, ambitious chemist, who established a good human relationship to all of his co-workers and so acquired the sympathy of all. He himself worked very much and I and my co-workers felt that he knew only three things in life: his work in the factory, his family and love for nature. He was an unusually just person, who did demand of the workers under his supervision the required efforts on the job, but who had an open mind for all and was ready to assist every co-worker. Contrary to other chemists that I had to do with in earlier years he was an entirely new type. He knew of no conceitedness because

- 2 -

of his professional standing, but appreciated people on the basis of their value and achievements. Because of these traits Dr. Jurster became very popular already at the start of his activities.

Dr. Jurster was a very tolerant man; he did not tolerate that anybody should be put to disadvantage because of his political or religious conviction. So I remember a special occurrence, I was known as an active Catholic. One of my co-workers wanted to provoke me and painted on the wall the words: "Pope Pius XI". Dr. Jurster saw this and inquired as to the cause of this writing. I told him that someone wanted to arouse my chagrin, because I was an active Catholic. Thereupon he demanded immediately that whoever painted these words should remove them within 5 minutes, which was promptly done. But the originator of this writing did not incur any disadvantage. So did Dr. Jurster, wherever it appeared necessary, protect the conviction of the individual.

Also later after Dr. Jurster had become director, one could present him with all requests and complaints. One could rely that he would do all in his power to aid reasonable requests and to remedy justified complaints. I remember a conversation I had with Dr. Jurster after the National Socialists had seized power.

At this occasion he asked me, if I belonged to a political party, I said no, whereupon Herr Dr. Wurster told me that he never belonged to a political party either. At another occasion - I do not remember the year anymore, but know that the National Socialists already were in power - I talked to him about the possibility of war. To this Dr. Wurster replied that war would be entirely senseless and that Germany never could win such a war. From all conversations that I had with Dr. Wurster I am firmly convinced that he was opposed to war, especially to an aggressive war and according to his inner attitude had nothing to do with the National Socialist Party.

I herewith declare expressly that I have never been a member of the NSDAP.

Ludwigshafen/Rhine, 20 October 1947.

Signed: Johannes Thoma

Above signature of Herr Johannes Thoma, executed before me, Attorney at Law Friedrich Wilhelm Wagner, Ludwigshafen/Rhine, Schloßhausstr. 52, is, herewith, certified and attested.

Ludwigshafen/Rhine, 20 October 1947.

Signed: F. W. Wagner

Attorney at Law.

Copy

Affidavit.

I, the undersigned Karl Joerger, born on 1 January 1896 at Schiltigheim near Strassbourg, resident at Ludwigshafen on the Rhine, I. Gartenweg 48 d, having been warned that I should render myself liable to punishment by making a false affidavit, declare that my statement is the truth and that I was informed that it will be submitted as an evidence to the Military Tribunal in the Palace of Justice in Nuernberg, Germany, for Case 6.

I have been employed with the Badische Anilin und Sodafabrik at Ludwigshafen on the Rhine without a break since 17 May 1912. At the beginning, I was a laboratory worker, then a laboratory assistant and later on, a foreman.

I made Dr. Wurster's acquaintance when he joined, as a young chemist, the staff of the laboratory in which I was working. Dr. Wurster struck the laboratory workers by his undefatigable zeal and the great eagerness with which he devoted himself to his work. He was a man of great kindness of heart, who helped his collaborators, regardless of their rank, actively and by advising them, and judged the people not by their social status or their class, but by their efficiency and human value. He struck us by this quality particularly for the reason that before he had come we had known many a chemist who always tried to show off their superiority as university graduates. Very soon Dr. Wurster had won

- 2 -

the sympathy of all the people who worked with him and under him, because all his actions were dictated by the principles of justice and charity.

I worked together with Dr. Wurster about 10 years and so I well believe to be in a position to judge his personality.

His special qualities evoked a great enthusiasm in his collaborators, and whatever he undertook succeeded. This made everybody respect him. When he was appointed director, that made no difference in his modest bearing. When I once addressed him as "Herr Direktor", he told me I should stop calling him "Herr Direktor" adding he was just the Dr. Wurster he had been before and nothing else.

When I no longer worked together with him directly in the same work, I continued to meet him occasionally in the plant and outside the plant. On all these occasions he behaved towards me, as well as towards other people in a comradely way, inquiring after the well-being of the families of his staff. He always was a man of deep social understanding.

Shortly before the outbreak of the war, I had a conversation with Dr. Wurster which I still well remember. On this occasion he expressed his opposition against a war and said, he was convinced there would be no war, declaring,

- 3 -

that our generation had no use for a war.

Later on, when foreign workers were employed with our factory, I occasionally told him that I had, on various occasions, tried to do the foreign workers some particular favors, to which Dr.

Wurster replied: "You are quite right, these people are human beings just like us, who want to live just as we do."

These utterances, which I no longer remember textually in detail, showed his desire to do for these foreign workers whatever was within our reach. On this occasion I also told him that there were two foreign workers from Belgium in my department, when I had provided with additional rations for heavy workers, exactly as the German workers had, and that I even had arranged that those two Belgian workers found private lodgings in the town. Dr. Wurster fully agreed to this.

I wish to state expressly that I was no member of the National Socialist Party.

Ludwigshafen on the Rhine, 20 October 1947

signed: Karl Joeger.

DOCUMENT BOOK VI WURSTER
DOCUMENT No. 132

- 4 -

The above signature of Herr Karl Joerger, executed before me,
Attorney-at-Law Friedrich Wilhelm Wagner, Ludwigshafen on the
Rhine, Schlosshausstrasse 32, is herewith attested and
certified.

Ludwigshafen on the Rhine, 20 October 1947

signed: F. W. Wagner
Attorney-at-Law

Copy

Affidavit.

I, the undersigned Dr. Joseph H i l l e, born on 26 February 1904 at Groventrueck, Westphalia, resident at Ludwigshafen on the Rhine-Oggersheim, Frankenthalerstrasse 64 a, having been warned that I should render myself liable by making a false affidavit, declare that my statement is the truth, I have been informed that they are to be submitted as an evidence to the Military Tribunal in the Palace of Justice, Wiesbaden, for Case 6.

On 1 October 1933 I started employment with the I.G. Farben-Industrie Aktiengesellschaft and was, in 1935, assigned to the Rheinfolden plant and, at the end of 1937, to the Ludwigshafen-Oppau plant. It was Dr. Wurster who engaged me for this plant.

I started my activity in the Ludwigshafen plant in the department that had been evolved, organized and directed by Dr. Wurster, that is, in the aluminium chloride fabrication. This in itself resulted in technical contacts with Dr. Wurster. During the following years I also got into closer personal contacts with him, which gave me a picture of his personality.

- 2 -

I myself was never a member of the National Socialist Party, on the contrary, I rejected, from the beginning, consistently National Socialism on the basis of my general political, spiritual and religious attitude; which caused certain personal encounters and difficulties. My political opposition to National Socialism and an encounter resulting from it was, finally, one of the circumstances which induced me to leave Rheinfelden and to move my activity to Ludwigshafen, in which I was greatly helped by Dr. Wurster.

It could be clearly seen from private conversations with Dr. Wurster that he was thoroughly opposed to the whole Nazi ideology as well as the practice out of his pronouncedly democratic-political opinions and Christian religious sentiments. Together with other politically attacked persons I highly appreciated that Dr. Wurster, in full consistency, twice openly refused to join the Party in 1937/38, in spite of the fact that he was twice invited to do so. Of course, when he had been promoted to (plant manager) Werksleiter in 1938, he was no longer able to express this refusal, which was based on his fundamental principles, in other way than in a cautious, reserved manner, since otherwise he would at once have been replaced by a ~~active~~ active Nazi. However, the anti-fascists of the Ludwigshafen-Opau plant regarded him, just as before, as a person they could well trust, who deeply regretted that his work

- 3 -

had to be carried on under the political symbol so hated by himself. When positions were to be filled in the plant, Party members were not given any preference, in opposition to the official instructions. In accordance with his personal attitude Dr. Wurster tried again and again, to mitigate and eliminate within the plant the hardships, the injustice and denunciations which the Nazi regime entailed for the politically, religiously and racially persecuted.

In conformity with his basic attitude, Dr. Wurster was altogether strongly opposed to warlike undertakings and wars of aggression and often expressed this repudiation of the warlike Party ideology.

I know that Dr. Wurster often inquired of his Betriebsleiter (section managers) and foremen about the treatment the foreign workers, who were employed with the plant, were given by the German staff, always insisting that no injustice should be done and that a decent, and, in the best sense, Christian attitude should be observed towards these people. The humane shape the problem of the foreign workers was given in the Ludwigshafen-Oppau plant, and which was generally praised, is essentially due to the Christian and democratic guidance of this generally respected plant manager Dr. Wurster.

Ludwigshafen on the Rhine, 23 October 1947

signed: J. Hille

DOCUMENT BOOK VI FURSTER
DOCUMENT No. 126

- 4 -

The foregoing signature of Dr. Joseph Hille, executed before me,
Attorney-at-Law Friedrich Wilhelm Wagner, Ludwigshafen on the
Rhine, is herewith attested and certified.

Ludwigshafen/ Rhine, 23 October 1947

signed: F. W. Wagner

Copy

Affidavit.

I, the undersigned Dr. Berthold S c h n e i l, born 9 January 1899 in Luedenscheid, residing in Ludwigshafen/Rhine, Weehlerstrasse 23 b, have been informed that I am liable to punishment for submitting a false affidavit. I declare that my statement corresponds to the truth and I know that it will be submitted to the American Military Tribunal at the Palace of Justice in Nuernberg for Case 6.

I was employed by Badische Anilin und Sodafabrik, Ludwigshafen/Rhine-Oppau as a chemist on 1 December 1925. I became Handlungsbevollmaechtigter and deputy chief of the ~~XX~~-Department of the Plant Ludwigshafen/Rhine of IG Farben Aktiengesellschaft. In 1942 I became Prokurist and later department chief. For many years I had indirect and direct contact with Dr. Wurster. Since I became Handlungsbevollmaechtigter in 1940 in particular, I made his closer acquaintance. My collaboration with Dr. Wurster and my connection with him which extends over a long number of years justify me in making the following estimate concerning the character and the personality of Dr. Wurster:

In his private life Dr. Wurster was so secluded that an outsider was hardly in a position to gain a conclusive picture about his personal likes and his domestic life.

- 2 -

Occasional remarks on his part lead me to believe that Dr. Wurster devoted at least part of his extremely limited leisure time to music and the reading of fiction. His almost regular attendance of the musical entertainments of the educational committee of the plant also showed his particular liking for concerts. Dr. Wurster, did not care for publicity a trait which would have been easily understandable considering his high social position. Rather, all observations lead to the conclusion that he disliked public glamour and society life. He preferred the simple, frugal life. This approach toward life also may be deduced from the fact that he sought relaxation and diversion in a modest little house in the Neckar valley that is in pronouncedly calm and nature - bound loneliness.

If I am to tell what I as a subordinate found particularly valuable in Dr. Wurster I should say:

His straight forward and sincere manner, his decent, unblemished character, his dignified confidence inspiring attitude, his unequivocal and clear decisions, his understandingly attentive readiness to help in social problems, his high concept of duty and his constant willingness to sacrifice for the hard tasks of his position. In discussions he showed a respect for the opinion of the collaborator^{or} of the opponent and he argued things out without hidden subterfuges. I can say without exaggeration that he was a model and an example in every respect. It also is

- 3 -

my firm conviction that there is hardly anyone in the plant who would not confirm the character sketch given by me. Herr Dr. Wurster was and today still is so to speak beyond any personal criticism. This is very remarkable considering the high percentage of staff members of the plant with pronounced individual tendencies - I am referring to the great number of university graduates. This character make-up of Dr. Wurster is most fortunately supplemented by an outstanding, extensive knowledge of subject matter and by a technical ability which he had acquired and trained in practice and also by the ability to treat successfully and solve constructively national and plant-economic problems, legal and administrative questions, all of which were closely connected with his position as head of a great industrial plant.

It is a matter of course that the above personality picture of Dr. Wurster does not fit him within the framework of a political party doctrine which limits individuality. I believe I am making a correct estimate of him if I see in him a follower of liberalism and of free economy which gives full scope to the unimpeded development of the individual. They, represented by men of his kind indeed produce and sustain the greatest good for the greatest number of people. A statement made by him to several executives of the plant to the effect that the good character of a superior would be of greater import than his technical knowledge - something to be considered in

- 4 -

making promotions--is significant along the same lines. Seen from this aspect, his Party membership must not be considered a voluntary decision emanating from his inner convictions but a sacrifice made for the plant to whose leadership he was destined and to whose preservation and progress he felt called. All his statements and his measures were made under this aspect of his position. He took great chances with the security of his person to ward off dangers threatening the continuance of the plant and to alleviate hardships to persons under his care. Dr. Wurster's achievements in this respect during the war, particularly during the last dramatic months and days for the plant and its people, must be entered in the annals of the plant as a shining chapter of human greatness if decency and human honor are not to become concepts without sense or meaning.

Herr Dr. Wurster was the embodiment of the good spirit of the plant which I believe would have suffered deep internal wounds in addition to the heavy external wounds produced by the war if it would not have been for his leadership.

Ludwigshafen/Rhine, 20 November 1947

signed: Dr. Berthold Schnell

I certify the above signature executed in my presence, of Herr Dr. Berthold Schnell, Friedrich Wilhelm Wagner, Attorney,
Ludwigshafen/Rhine.

Ludwigshafen/Rhine, 20 November 1947

signed: F. W. Wagner
Attorney

Copy

Affidavit

I, the undersigned Dr. Hans Mehnert, residing in Heidelberg, Moenchhofstr. 11 have been informed that I am liable to punishment if I submit a false affidavit. I declare in lieu of oath that my statement corresponds to the truth and was made for the purpose of being submitted to the Military Tribunal at the Palace of Justice in Saarburg, Germany.

I was employed by the former Badische Anilin und Soda Fabrik Ludwigshafen/Rhine as chemist on 1 April 1902. I worked in the Ludwigshafen plant until 31 January 1940 - my last position was that of prokurist of IG Farbenindustrie Aktiengesellschaft; since that time I am in retirement. My sphere of work during the last years of my activity pertained to assisting the plant management in general administrative matters. This kind of work naturally resulted in talks which concerned matters beyond business affairs with gentlemen from the plant management, particularly with Dr. Wurster. My official and private discussions with Dr. Wurster enabled me to gain a very clear picture of his personality and I could ascertain quite correctly his approach toward the events of the day. In the course of this, I met in Dr. Wurster a person not only of outstanding personality and of rare technical and organizational talent, but also a person of deep religiousness anchored firmly in the basic principles of Christian ethics and conducting his daily life accordingly. In addition, Dr. Wurster

- 2 -

was distinguished by a pronounced enjoyment of research and creative activity. All these qualities predestined him to an outstanding extent to become the head of a great industrial plant. When he took over the leadership of plant Ludwigshafen/Rhine-Opau on 1 March 1933, his primary aim was the perfection of the factory and the maintenance of its great tradition as well as the welfare of the staff which he cared for with an extraordinarily well-developed sense of justice and with much sincerity and sacrifice.

In conformance with his whole make-up Dr. Wurster was intrinsically removed from political affairs; nevertheless he watched the political development inside Germany with great care and increasing worry. However, conforming to his optimistic nature his conviction came to the fore again and again that Germany and European problems would permit of a peaceful solution. He repeatedly expressed his opinion that he was deeply convinced that another war would signify the end not for Germany only but probably also for all of Europe. Consequently the outbreak of the war in 1939 shocked him and moved him deeply. A conversation on 3 September 1939 in particular showed this. This conversation has impressed me to such an extent that I can almost repeat it verbally even today. It was the day on which the declaration of war by the Western powers had been made public. Shortly thereafter the Transmitter Station W in Ludwigshafen received the telegram containing announcement of the Mobilization Status (Mob-Fall) for Ludwigshafen. After receipt of this telegram I informed Dr. Wurster who happened to be swimming in the Rhine River. I sent a car there which brought him back immediately.

- 3 -

Dr. Wurster was deeply depressed and he said to me something like this: "You will see that this signifies the end of our beautiful plant and of our homeland. Because aerial warfare will destroy everything in this war. And, anyway we are not adequate to any technical warfare for any length of time". This deeply pessimistic discussion, was finished by Dr. Wurster saying that we little individuals had no choice but to remain at the station to which fate had assigned us and to attempt our best for the preservation of the plant entrusted to us and for the people working there.

Ludwigshafen/Rhine, 13 October 1947

signed: Dr. Hans Mehnert

I certify the above signature of Dr. Hans Mehnert, residing in Heidelberg, Moenchhofstrasse 11 executed in my presence. Dr. Wolfgang Heintzeler, Ludwigshafen/Rhine, Brunnstrasse 13.
Ludwigshafen/Rhine, 13 October 1947

signed: Dr. Wolfgang Heintzeler

Attorney

- 112 -

CERTIFICATE OF TRANSLATION

1 April 1948

We, Frank Friedenthal, Robert Hoffmann, Joseph W. Gesser, Adolph Luthaus hereby certify that we are duly appointed translators for the German and English languages and that the above is a true and correct translation of the Document Book 6 Airster.

Frank Friedenthal
B 242988

Robert Hoffmann
20162

Joseph W. Gesser
B 387993

Adolph Luthaus
B 398010

Ref. Case 6

Table of contents for document book IV A
for Dr. Carl MERTZKE, Case VI

Doc.No. Exh.no.	Contents	Page
-----------------	----------	------

Count III: Foreign workers.

Statements of foreign workers about their treatment
at the I.G. plant Ludwigshafen-Opau.

105	Affidavit of the French physician Charles MERTZKE from 7 Dec 1947. Dr. MERTZKE was working as a physician at the City Hospital Ludwigshafen from 1943. In the affidavit he said among other things: "I treated French PWs as well as French civilian workers and civilian workers of other nationalities." They came from various plants of the Ludwigshafen industry but particularly from I.G. plant (Badische Anilin- und Soda-Fabrik). "I never heard the patients complaining of their treatment at the Badische Anilin- und Soda-Fabrik."	1 - 3
251	Affidavit of the French officer Fred MUSEL from 16 Jan 1948. Witness was employed at the I.G. plant Ludwigshafen in 1943 and states among other things: "The treatment of workers (French) was correct in every respect." Then he tells particulars about the living conditions of his countrymen at the I.G. plant Ludwigshafen during the war.	3 - 6
125	Affidavit of the Frenchman Fernand RYMANN from 3 Dec 1947. RYMANN worked at the I.G. plant Ludwigshafen from 1941 until 1945; he lived privately in town during all this time. He worked together with other Frenchmen and Russians, and states among other things: "We never had to complain about the treatment which was exactly the same as that of the Germans. I never could ascertain a mistreatment either of prisoners or civilian workers ... We and the Germans did the same work and we worked in teams with them. During alarms we went together to the shelters." "The factory really did all it could and put us on the same level with the German workers."	7 - 9



Table of contents for document book IV A
for Dr. Carl MÜSTER, Case VI.

Doc.No. Dzh.H.	Contents	Page
106	Affidavit of the Yugoslav Ivan LUDOVIC from 15 May 1947. "In 1941 I reported voluntarily for work in Germany; I did that at a recruiting office of the German Labor Front. I came then to Ludwigshafen to I.G. Farbenindustrie Aktien-gesellschaft where I worked in the Gynatrium plant voluntarily until the end of the war... I felt very well during the whole period of my work at the I.G. Ludwigshafen. ... When I came to Germany from Yugoslavia I had with me hardly any clothing at all. I was then, first of all, equipped by the I.G.	10 - 12
207	Affidavit of the Yugoslav woman Anna SCHMUCK from 14 Oct 1947. "I could move absolutely freely and lived in best comradeship with my countrymen and members of other nationali- ties."	13 - 14
208	Affidavit of the Yugoslav Joseph POJE from 15 Oct 1947. He was employed at the I.G. plant Ludwigshafen in the economic department (Ford) from March 1943 until the end of the war and tells particulars about his observations.	15 - 18
209	Affidavit of the Polish national Josef KRUZEL from 10 March 1948. He is a Polish citizen and was employed as a worker at the I.G. plant since 1913. When he was interned as a Pole together with some of his countrymen in December 1939, the plant successfully endeavored to get him released so that he was able to take up his work on 1 March 1940 as a free worker at his old working place.	19 - 20
268	Affidavit of the Rumanian national Gerhard KRUZEL from 4 March 1948. He is a Rumanian and from 1941 worked in the I.G. plant Ludwigshafen in the economic department on problems of clothing; he tells his observations.	21 - 22
270	Affidavit of the Polish national Josef GRUBEL from 8 March 1948. He is a Polish citizen and was employed at the I.G. plant Ludwigshafen as a worker from 1911 and as a foreman from 1932. Affiant who has talked often with Dr. MÜSTER personally, testified: "During the war I was treated in the same way as every German national; I was not in- convenienced or oppressed in any manner."	23 - 24

Table of contents for document book IV A
for Dr. Carl WUSTER, Case VI.

Doc.No. Exh.No.	Contents	Page
	<u>Affidavit of persons which received letters of appreciation from former foreign workers of the Ludwigshafen plant.</u>	
182	Affidavit of Dr. Walter SPORMANN from 21 November 1947 with letter from the French worker Le Droton from 23 May 1947.	25 - 28
181	Affidavit of Heinrich SINGEL from 26 Novem- ber 1947 concerning the French worker Le Droton.	29 - 30
111	Affidavit of Hans SIEGEL from 21 November 1947 about letters from the French worker Rosenflier from 13 May and 28 May 1946.	31 - 34
266	Affidavit of Hermann WILH from 3 March 1947 with letter from the Belgian worker F. van Polfiel from 22 December 1946.	35 - 36
191	Affidavit of Adolf WAGLE from 21 November 1947 with letter from the French worker Gabin from 29 June 1947.	37 - 42
193	Affidavit of Dr. Walter WISLY from 21 Novem- ber 1947 with letter from the French worker Torral from 27 June 1946.	43 - 46
287	Affidavit from Heinrich MUELL from 4 March 1948 with letter from the Belgian nationals André and Hedwig Van Beckhoutte from 8 December 1947.	46 - 50
269	Affidavit of Dr. Lothar LOMME and Dr. Walter Daniel from 3 March 1948 with letter from the French national Tatiana Karsons from 21 November 1946.	51 - 54
277	Affidavit of Dr. Bernhard FIDEL from 3 March 1948 with letter from the French worker G. Danbriso from 15 December 1948.	55 - 57
278	Affidavit of Dr. Wolf SISTIG from 3 March 1948 with letter from the French worker André Mouriquet from 6 May 1946.	58 - 59
279	Affidavit of Dr. Josef HINGSTENBERG from 3 March 1948 with letter from the French worker A. Andrain from 15 November 1941.	60 - 64
280	Affidavit of Dr. Josef HINGSTENBERG from 3 March 1948 with letter from the French worker Maurice Jean Donervaux from 2 July 1942.	65 - 66

Table of contents for document book IV A
for Dr. Carl WHESTER, Case VI.

Doc.No.	Exh.No.	Contents	Page
201		Affidavit of Dr. Josef HINGSTENBERG from 3 March 1947 with letter from the French worker Andre Mourguas from 17 December 1947	67 - 69.
205		affidavit of Dr. Fritz MUELLER from 3 March 1948 with letter from the French worker Maurice Dlard.	70 - 71.

Copy.

AFFIDAVIT.

I, the undersigned Dr. med. Charles WURSTEL, born 21 May 1913 in Esposchiedt, Lorraine, France, residing in Metz, Hospital Dollo - Islo, was informed that it is my duty to tell the pure truth and that I am liable to punishment if I make a false affidavit. I am informed that this affidavit will be used as evidence before the American Military Tribunal in the Palace of Justice in Nuernberg trying case VI.

By orders of Nazi authorities I was inducted as physician from a hospital in Metz for emergency service in August 1943 at the City Hospital Ludwigshafen a.Rh. I worked at the Ludwigshafen City Hospital at the surgical ward until the end. I treated French PWs as well as French civilian workers, and civilian workers of other nationalities, PWs and foreign workers, injured as well as sick, came from various plants of the Ludwigshafen industry but particularly from the I.G. Farben/ustrie Aktiengesellschaft, plant LaSF, Ludwigshafen. I can state on the ground of my experience that patients were brought ⁱⁿ for medical treatment in the fastest way. I never heard from the patients complaints about their treatment at the Badische Anilin - und Soda-Fabrik. In our

(page 2 of original)

ward foreign patients were treated in the same manner as the
German sick although that did not always correspond with
official directives.

Ludwigshafen a.Rh., 7 December 1947.

/s/ Charles LINTH

The above signature of Dr. Charles LINTH is certified hereby.

/s/ F.W. MACHEN
Attorney-at-law.

Copy.

AFFIDAVIT.

I, the undersigned Fred. M. L., at the present time control officer at LaSF Ludwigshafen on the Rhine, residing in Ludwigshafen a.Rh., 43, Leuschnerstrasse, know that I am liable to punishment if I make a false affidavit.

I affirm under oath that my statement corresponds strictly with the truth and was made in order to be submitted as evidence to the Military Tribunal VI at the Palace of Justice in Worms, Germany.

I was sent by the Societe Francoise to Paris to the I.G. Farben in order to study production processes before applying them at one of the factories of the Soc. Francoise (Villars St. Paul); I stayed at the factory of the I.G. Farben Ludwigshafen from the beginning of September until the end of December 1942. I had to study particularly the production of formaldehyde based on a new process developed and perfected by I.G. Farben.

An aggregate for the production of formaldehyde was sold by I.G. Farben to Societe Francoise and the process was put at its disposal.

This installation was actually transported, reassembled and put on the way to France (Villars St. Paul) in 1943. During my stay at the factory at Ludwigshafen besides of my professional occupations I accepted the duty to maintain a contact

(page 2 of original)

between the French workers from Francolor working at Ludwigshafen, and the German management of this factory.

I am therefore in the position to furnish some information about the living conditions of French workers who worked in the factory at Ludwigshafen.

The treatment of these workers the majority of which worked in the plants for the production of phthalic acid and formal was correct in every respect. Generally the quality of the French workers was appreciated very much by the German offices especially as far as fitters, pipe-layers and adjusters were concerned.

Living conditions.

- The factory had established camps in the vicinity of the plants between Ludwigshafen and Oppau. They were very well installed, well kept and well heated. Latrines, showers and baths with hot water during the whole day were provided abundantly.

Food.

The food was the same as that the Germans had at the factory. However, it was not very abundant and did not correspond as to value and quantity with what a worker living with his family ate in France.

In order to compare I estimate that it was about equivalent to the food a worker or employee could get at a mess hall or a restaurant in France at this period.

(page 3 of original)

Working hours.

The workers worked according to branch 42 or 56 hours a week and were used within possibilities in their speciality.

Surveillance.

The workers came and went freely from the camp to the factory; they also visited the town and its neighbourhood.

At this period they could have at restaurants in town the Stummgericht (a meal without ration tickets consisting essentially of a vegetable salad, a vegetable soup and potatoes) for RM. 1.-- (The wages for 1 hour were from RM. 1.-- to RM 1.20).

Medical care.

Medical care was administered at a camp dispensary well equipped and directed by a German physician.

Alarm.

During alarms French workers as well as those of other nationalities had directives to go to solid shelters made of concrete which were located at a distance of about 300 m from the camp.

General impression.

I was under the impression that at the time of my stay in Ludwigshafen the German management of the plant did whatever it could to secure an adequate existence for the French workers and to improve the living conditions of foreign workers within the limits allowed by the rather strict and

Document Book IV A WILSTER
Document No. 251
Exhibit No.

(page 4 of original)

rigid directives of the Labor Front.

Ludwigshafen on the Rhine, 16 January 1940.

/s/ F. EGEL

The above signature of Mr. Prof. EGEL, signed before me,
F.W. MAGILL, Attorney-at-Law, Ludwigshafen a. Rhein, Schloss-
hausstrasse 32, is certified herewith by me.

Ludwigshafen a. Rhein, 16 January 1940.

/s/ F.W. MAGILL
Attorney-at-Law.

Cont.

AFFIDAVIT.

I, the undersigned Fernand RYDARSEN, born 15 June 1908 at La Neuville-lès-Bain, Vesnes, residing at Ludwigshafen on the Rhine, Gröschstrasse 10, certify that I was informed that I am liable to punishment if I make a false affidavit. I declare that my statement corresponds with the truth and that I know that it will be submitted as evidence to the American Military Tribunal at the Palace of Justice in Anvers for the case VI.

I worked at the I.G. Ludwigshafen from 1941 to 1945. At the beginning I was accommodated at a Kameradschaftshaus (comradeship house) in town; then I lived privately until the arrival of the Allies. The majority of my comrades lived in various factory camps where I visited them from time to time. But I also had other comrades who lived in town like I did. We were issued the same rations like the Germans and we could eat with our ration cards where we wanted to. Usually we ate at the I.G. mess hall, called Feiernachtshaus, together with the Germans and were served the same food.

I worked in Building No. 334, Elektrobetrieb, under the directives of a German foreman Kochlein. We were several Frenchmen and Russians, who came from France; we never had to complain about the treatment which was exactly the same as that of the Germans. I never could ascertain a mistreatment.

(page 2 of original)

of prisoners or civilian workers. Incidents between German and foreign workers never occurred in my plant. Our work was the same as that of the Germans and we worked with them in teams. During alarms we went together to the shelters.

When visiting my friend in the camps I saw that they were well installed, there were great latrines, and shower rooms, dining rooms which were also used for shows. My comrades who lived there never complained to me about their treatment. They were perfectly free to do what they liked. Neither did they complain about the food. Obviously since the German rations diminished our rations diminished, too, at any rate we were not more hungry than the Germans.

When needing footwear or clothing we could request a ration ticket from the Wirtschaftliche Abteilung (Economic department) and within possibilities we always were satisfied.

Thus I had a whole suit, shoes and other small necessary items. Often we were offered shows and concerts, in the camps or in the grand hall of the Foyer du Peuple. We had at our disposal newspaper and libraries.

(page 3 of original)

All in all we were not unhappy in Ludwigshafen; of course, we were far from home, however, everything was done for us to make our stay in Ludwigshafen bearable. The factory did all it could and put us on the same level with the German workers.

In spite of an explicit prohibition of the Labor Front the factory always tolerated our living privately and furnished us with the necessary identity documents and food ration cards.

Ludwigshafen, 3 December 1947.

/s/ F. EYMANN

The above signature of Mr. Fernand EYMANN, signed before me, Friedrich Wilhelm Wagner, Attorney-at-Law, Ludwigshafen on the Rhine, is certified herewith.

Ludwigshafen on the Rhine, 3 December 1947.

/s/ F.W. WAGNER
Attorney-at-Law.

CERTIFICATE OF TRANSLATION

31 March 1945

I, Stanislaw S. FELDMAN, Civ.No. WFO 1043, hereby certify that I am a duly appointed translator for the German, French and English languages and that the above is a true and correct translation of original document.

Stanislaw S. FELDMAN
Civ.No. WFO 1043.

Copy

Affidavit

I, Ivan BODOVIC, born on 24 May 1897 at Klenak (Yugoslavia), residing in Ludwigshafen a.Rh.-Oppau, Schoeneplatz 8, have been warned that I am liable to punishment if I make a false affidavit. I declare under oath that my statement corresponds to the truth and that it was made in order to be submitted as evidence to Military Tribunal No.1, Palace of Justice, Nuerenberg, Germany.

In 1941 I reported to a hiring office of the German Labor Front and volunteered to work in Germany. Consequently I came to Ludwigshafen to the I.G. Farbenindustrie Aktien-gesellschaft, where I worked voluntarily in the cynnatrium plant until the end of the war. In this plant I was employed in various jobs, at the beginning as day shift worker in all pertinent works. During the last 1 1/2 years I was employed as stoker for the contact furnaces. This was a highly responsible job because it was important to maintain steady temperatures. Special wages were paid for this job.

I was content and satisfied during the entire time I worked for the I.G. Ludwigshafen. At the beginning I was billeted in camp III and later in camp VI and VII. My accomodations there were decent and I was also satisfied with the food. I was never beaten or maltreated on the contrary the cooperation with the German workers was always a very good one.

(page 2 of original)

As heavy worker I received also the additional food rations to which the German workers were entitled. I received the same wages as the German workers, inclusive the monthly bonus, furthermore I was granted all those additional payments which could legally have been given to me, as burden allowance, stoker allowance, night shift allowance, Sun- and holiday allowance etc.

When I came from Yugoslavia to Germany I had hardly any clothing with me. After I joined the I.G. I received the following clothing from the I.G. plant: 2 blue working overalls, 2 shirts, clogs, foot-bandages and gloves.

During my activity I was able to save some money from my wages. As I received a ration card for clothing in Germany I was able to purchase from my savings a very nice new Sunday suit, very good shoes, shirts, a summer coat and everything required for a decent Sunday outfit.

I enjoyed the time I worked for I.G. Ludwigshafen very much, and today I would like to return voluntarily to this firm. At present I work for a construction firm in Ludwigshafen, but there I have not got the same advantages and not the same decent life I had with the I.G.

Ludwigshafen a.Rh. 16 May 1947

signed: Bodovic Ivan

(page 3 of original)

Document roster No. 1239/47 A

I herewith certify and confirm the above signature of
Ivan BODOVIC, according to his Carte Identite No. 17 941
of 15 May 1946 of Yugoslave nationality, at present residing
in Ludwigshafen-Oppau, Schoenaupplatz 8, made before the
undersigned notary public Dr. ACKERMANN, residing in
Ludwigshafen,

Ludwigshafen a.Rh. 16 May 1947

signed: Dr. ACKERMANN
Notary public

Official seal:

GR No. 2034/47

Fees article 39	2.--
5 copies	10.--
turn-over tax	0.36
Total	12.36

Copy

Affidavit

I, SCHUCK Anne, Ludwigshafen a.Rh.-Oppau, Mozartstrasse 29, have been warned that I am liable to punishment if I make a false affidavit. I declare under oath that my statement corresponds to the truth and that it was made in order to be submitted to the Military Tribunal, Palace of Justice, Nuernberg, Germany.

I was born on 14 September 1919 at Drondol/Yugoslavia, and in February 1942 I was forcibly resettled to Ren in the Styria. In May 1943 the local labor office sent me an order to report to the I.G. plant Ludwigshafen a.Rh. There I was employed as kitchen supervisor in the kitchens of camps III, VI and VII and remained in that position until the end of the war.

I had no complaints about the treatment, food and billets. The pay was also decent. Several times I even received special allowances consisting of clothing or money.

The relationship between me and my German supervisors was a good one, and I never had any reason to lodge a complaint. I was able to move around freely and I lived in perfect comradeship with my fellow countrymen and members of other nations. Although I myself did not live in the camp, but had a private apartment, I was always under the impression that the majority of those who lived in the camp were satisfied with the prevailing conditions as far as accommodation was concerned.

Ludwigshafen a.Rh. 14 October 1947

signed: Anne SCHUCK

Vg. u.u.

Document roster No. 2409/47 A

I herewith certify and confirm the above signature of
SCHUCK, Anna, Ludwigshafen/Rh. -Oppau. Mozartstrasse 29,
identified by her identification card showing her photograph,
which was made before Dr. Karl ACKERMANN, Notary public,
Ludwigshafen a.Rh.

Ludwigshafen a.Rhein 14 October 1947

(Official Seal)

signed: Dr. ACKERMANN
Notary public.

Affidavit

I, POJE Josephe, Ludwigshafen/Rh. -Oppau, Mozartstrasse 29, have been warned that I am liable to punishment if I make a false affidavit. I declare under oath that my statement corresponds to the truth and that it was made in order to be submitted as evidence to the Military Tribunal, Palace of Justice, Nurnberg, Germany.

I was born on 23 February 1903 in Prose/Yugoslavia, my profession is hotel porter, in March 1942 I was hired by German offices in Agram and from there I came to the I.G. Ludwigshafen. There I met the people of the I.G. for the first time. I was received by the then Head of the economic department, Herr Prokurist WIENS, and was sent by him, respectively by Herr PETRY into camp III, which was in the immediate vicinity of the plant in the city district of Oppau. At first Herr WIENS assigned to me the job of kitchen supervisor for the camps III and IV, later on also for the camp V which had been erected in the meantime. Herr PETRY directed me to see to it that my fellow countrymen and the other foreigners who were accommodated in these camps would receive all the food supplies to which they were entitled and also that the camp would be orderly and clean.

I worked completely independent in this field of tasks during the entire time of my employment (until the end of the war). During the entire time I was under the impression that the economic department exerted all efforts in order to provide sufficient decent and tasty food: only the best food stuffs were used for the preparation.

As I come from the hotel Branch I was able to draw a comparison as far as the food was concerned.

Herr WIENS and Herr PETRY came from time to time in irregular intervals, at various times during the day and they themselves inspected the preparation of the food, the quantity and saw to it that it was given out without delay.

The food was issued in accordance with a weekly menu. The quantities mentioned in the menu were always issued to the workers. A menu was available in the dining hall so that the persons eating there could examine it.

A canteen was attached to the dining hall where beer and lemonade was issued, at the beginning also 1/4 liter of wine. per week.

Occasionally we received also special allowances of food supplies, as for instance on Christmas we received a parcel containing a Christmas cake, ginger-bread, 500 grams of sausage, hard liquor or cognac and tobacco.

Of course it happened now and then that the one or the other complained about the food, however in general if one considered the number of the persons fed, this was a minor factor only. It was connected more or less with the personal wishes of the individual which cannot be satisfied even if one tries very hard as long as these persons are fed in a communal kitchen.

The camp itself which accommodated about 2 400 persons was equipped with hot and cold water, bath rooms, W.Cs. as well as central heating.

I lived with a couple in a room which was very nicely furnished. I myself put in a lot of furniture according to my own taste.

Great emphasis was put on order and cleanliness within the camp. As far as necessary actions to destroy vermin were carried out. Besides that the camp had a hospital, a tailor shop and a barber. In their leisure time, the persons living in the camp together with the cultural agencies of the plant, carried out cultural performances. The plant too provided changes in the organization of leisure time by sending men and women actors. Furthermore we had our own football team.

I felt very well in the camp, was able to move around freely and was not subject to any control. The relationship between me and my superiors was a very good one, even a friendly one. I was never under the impression to be subject to any curses. The suggestions I submitted were nearly always accepted, especially if they concerned matters in connection with meeting justified wishes of my fellow countrymen and the rest of the foreign workers.

I did not know Dr. WHESTER personally, but I was often surprised to see that everything in the works, where thousands of workers, especially also foreign workers were employed, went on so smoothly. I was convinced that the plant management did everything in their power to meet the requirements of the workers. This attention as far as the workers were concerned could be seen especially after air-raids. I remember well that the camp III was severely bombed and that the kitchen too was destroyed.

Immediately after the "wall clear" work was started to rebuild the kitchen and the persons fed by this kitchen received their food with small delay only, taking into consideration the extent of the destruction. The same thing happened after every raid in all other camps where I came in contact with workers of all nationalities. The same care was given to the Poles in camp V. Especially in 1944, the camp suffered considerably from the air-raids. For instance the water supply line was frequently destroyed. Immediately big water tanks mounted on trucks supplied fresh water until the water supply line was repaired so that there would be no delay in the preparation of the food.

I would furthermore like to mention that the kitchen staff was granted a day off every week and it was completely left to the personnel how it wanted to spend that day.

I was also satisfied with the treatment I felt fully owed to the German workers.

Ludwigshafen a. Rh. 15 October 1947

Signed: Josef PODJ

vg.u.u.

Document number No. 2410/47

I herewith certify and confirm the above signature of P. J. Joseph, Ludwigshafen a. Rh.-Gau, Mewertstr. 29, as well as before Dr. JOCKELMANN, Notary public, Ludwigshafen/Rh. Herr PODJ identified himself by his identification card.

Ludwigshafen / Rh. 15 October 1947

Official seal.

Signed: Dr. JOCKELMANN

Notary public.

Copy

Affidavit.

I, Josef KUPFER, born on 9 September 1895, residing in Ludwigshafen a. Rhein, Reichstr. 16, have been warned that I am liable to punishment if I make a false affidavit, I declare under oath that my statement corresponds to the truth and that it was made in order to be submitted to the Military Tribunal, Prison of Justice Nuremberg, Germany.

1. I am a Polish subject and on 28 April 1913 I entered the services of the Deutscher Anilin & Sulfurik factory at Ludwigshafen. I always worked in the sodium hydroxide factory and I cannot complain about the treatment I received from my co-workers or my superiors. I worked in my laboratory also during the war against Poland. Only some time later on, as far as I remember at the end of November, beginning of December 1939, I together with my men and about 36 other Poles were on the installation of the state authorities removed from the city of Ludwigshafen and were brought to Nuremberg, where we were interned.

My wife, who is also a Polish subject, was not interned and turned to the plant, requesting that the plant should take steps to obtain my release. In matters of fact the plant intervened on my behalf in order to obtain my release.

We were released in February 1940 and on 1 March 1940 I resumed my work and there were no changes as far as the treatment and pay was concerned.

2. I also received the Christmas gratification which is being distributed in the plant every year. As before, I was granted leave and was not prejudiced in any way.

3. I know Dr. WUSTEN from sight and I never heard anything detrimental about him.

He visited our shop frequently and he talked with me at my place of work. I was under the impression that he was a decent upright person.

Ludwigshafen a. Rhein, 10 March 1940

Signed: KURT J. J. J.

I herewith certify and confirm the above signature. I Josef KAUZEL,

Ludwigshafen a. Rhein, 10 March 1940, as a witness at law

Friedrich Wilhelm WUSTEN, Ludwigshafen a. Rhein.

Ludwigshafen a. Rhein, 10 March 1940

Signed: F. W. WUSTEN

Attorney-at-law.

Copy

Affidavit

I, KENZEL Gerhard, merchant, residing in Ludwigshafen a.Rh.,
Gewestr. 1, have been warned that I am liable to punishment if
I make a false affidavit. I declare under oath that my statement
corresponds to the truth and that it was made in order to be
submitted as evidence to the Military Tribunal, Palace of Justice,
Nuremberg, Germany.

I am a German national and in 1941 I was assigned work in
the I.G. plant Ludwigshafen. At first I was employed as laboratory
worker in the dye department and because of my linguistic know-
ledge I was transferred to the economic department as interpreter
and commercial employee. At the beginning I was in charge of the
reporting office for foreign civilian workers, later I became
official for the distribution of clothing, also for foreign civilian
workers. On account of my activity with the I.G. I am in a
position to confirm that the directorate, especially the economic
department did everything in its power to improve the living condi-
tions of the foreign workers and to supply them with clothing and
shoes. In particular I am in a position to confirm the following:
1.) that it was repeatedly pointed out to me to purchase the
clothing for which we had applied as quickly as possible with
the aid of ration cards,
2.) that I - as far as I remember in 1944 - was ordered, to
negotiate with a firm in Muenchen-Gladbach in order to
achieve that about 4,000 (four thousands) suits for Eastern
workers which the I.G. had ordered from them would be delivered
as quickly as possible.

these suits were then actually delivered. The suits were later issued to Eastern workers by the firm Schuh in Ludwigshafen.

- 3.) Furthermore I would like to confirm that I, as co-worker in the administration of the economic department, gained the impression that everything possible was done to secure the supply of the foreign workers and especially every effort was made to satisfy the justified wishes of the foreign workers.
- 4.) My attention was drawn to the fact that the Eastern workers, men and women, were after some time, all better clothed as compared to their arrival.
- 5.) I had no reasons for complaint during my activity. I would even like to state that, under the then prevailing conditions of war, I had a good life. I was under the impression that the rest of the foreign workers, as far as I got in touch with them, were also satisfied. The plant management personally inspected the camps now and then and saw to it that everything was done in order to secure decent living conditions for the foreign workers.

Ludwigshafen a.Rh. 4 March 1948 signed: Gerhard KENZEL.

I herewith certify and confirm the above signature of KENZEL, Gerhard, which was made before the notary at law Friedrich Wilhelm JENSEN.

Ludwigshafen a.Rh. 4 March 1948

signed: F. W. JENSEN

Attorney at law.

Oggy

Affidavit.

I, Josef CHUDNIK, born on 26 January 1897 in Branczyn in Poland, at present residing in Ludwigshafen a. Rh., Prinzregentenstrasse 53, have been warned that I am liable to punishment if I make a false affidavit. I declare under oath that my statement corresponds to the truth and that it was made in order to be submitted as evidence to the Military Tribunal, Palace of Justice, Nurnberg, Germany.

- 1.) I am a Polish national and on 21 May 1911 I entered the services of the then Badische Anilin- & Soda-Fabrik in Ludwigshafen a. Rh. I was employed in the aniline department, al-rine and a diam hydroxide factory. On 1 April 1932 I was appointed foreman.
- 2.) I remember that Dr. WUSTER, at the time when he still was Head of the aniline department, visited the shop hourly every day and that he very often discussed matters with me. As one of the oldest workers he knew me personally and I was always glad when Dr. WUSTER came to me, because he had always a friendly attitude to me. I was able to submit my wishes to him. At that time I was granted a rise of RM 5.- per week on his initiative.
- 3.) Even later, when he became director, I saw him now and then. I heard no complaints about him and his manner towards the workers of the plant did not change.
- 4.) During the war foreigners and Poles were employed in the plant where I worked.

They were treated decently on the direct rate introduced to make the living conditions of these people better than those ordered in the valid regulations.

5. I was especially in touch with my fellow countrymen who came to us during the war. I did not hear any complaint about the directorate from these persons.
6. I myself received the Christmas gratifications and the bonus for long service in spite of the fact that this, as far as I know, was contrary to regulations in force. I was always under the impression that the directorate tried to take care especially of the old, proved workers. During the war I was treated like every German national and was not oppressed or persecuted in any way.

I carried out my job until the age of 66 and was pensioned off in 1945. Since then I receive an additional pension from the Reichsanstalt für Alters- und Invalidenversicherung, just like all other employees of the plant.

7. I would like to add that as far as I know Dr. TUSTEN, I am convinced that he always exerted his influence for the welfare of the workers and that he was a very humane and helpful person.
- Ludwigshafen a.Rh., 6 March 1948

signed: CHUDNIK Josef

I herewith certify and confirm the above signature of Josef CHUDNIK, residing in Ludwigshafen a.Rh., Prinzergerstr. 53, which was made before attorney at law Friedrich Wilhelm T. GNEB, Ludwigshafen a.Rh.

Ludwigshafen a.Rh., 6 March 1948

signed: F. W. GNEB

Attorney at law.

Document Book IV A TULSTER
Document N.
Exhibit N...

CERTIFICATE OF TRANSLATION

1 April 1948

I, S.J. Hamburger ETO 20062, hereby certify
that I am duly appointed translator for the
German and English languages and that the
above is a true and correct translation of
document book IV A TULSTER.

S.J. Hamburger

ETO 20062.

Copy.

Document Book IV: UNSTER
UNSTER Document No. 182
Exhibit No.

AFFIDAVIT.

I, the undersigned Dr. Walter Spormann, born 19 January 1910 in Peine/Hannover, residing in Ludwigshafen on the Rhine, Bruckstrasse 8, have been duly warned that I shall render myself liable to punishment by making a false affidavit. I declare that my affidavit corresponds with the truth, and I have been informed of the fact that it will be submitted as evidence at the Military Tribunal in the Palace of Justice in Nuernberg for the case VI.

Since 16 November 1937 I am employed as a chemist in the anorganical department of the Deutsche Salin- & Soda-Fabrik in Ludwigshafen on the Rhine. During the war appr. 30 - 40 foreign workers were employed in my department, partly as factory workers, partly as laboratory workers. Among the laboratory workers was also a French foreign worker called Jean Le Breton. Jean Le Breton was an intelligent man who also understood German. He worked in my laboratory for about one and a half years and worked altogether for about 30 months in our factory. He left my laboratory later in order to work for the Comité d'entr'aide français. The Comité d'entr'aide français had the task to organize the provisioning, the accommodation and the recreations for the French foreign workers and to discuss them with the German management of the plant. Le Breton had been released from all other activities in the factory in order to be able to carry out this work of

- 2 -

assistance for his French comrades, and belonged therefore to the economic department of our plant which handled the provisioning of the foreign workers. Le Breton was therefore in an excellent position to judge from his own experience about the treatment of the foreign workers by the management of our works and by their executives.

After he had left my laboratory and started to work on behalf of his comrades I met him occasionally in the street, in the city or in the works and at those occasions he always expressed his great satisfaction in regard to the manner in which the management treated his comrades and himself.

When, in May of this year, I learned that charges had been made against our works to the effect that we had not treated decently our foreign workers, I decided on my own, without any request by the management, to write a letter to Le Breton, and I received his answer on 23 May 1947. This letter states as follows:

"Jean Le Breton
8 Avenue Laplace
Arcueil (Seine)

Arcueil, 23 May 1947

Drafted by the obligatory labor service from 4 December
until 3 April 1945
Founding member of the Comité d'entraide français.

Dear Dr. Spornann,

I was happy to hear from you and to learn that you passed the last moments of the war without too much suffering.

I myself had not left Oppau and was repatriated very speedily and on 3 April 1945 I was with my family in Paris and enjoyed to be reunited with them after these months of separation and worries.

- 3 -

Unfortunately I see that the worries are not over and that the great shock of this war still causes strong repercussions within the borders of all countries.

As far as I am concerned I would be very glad if my testimony could be of any use to you. During the 30 months which I was at your works I had ample opportunity to appreciate your sense of justice, so that I consider it now my duty to answer to your request.

I am surprised to hear of the charges of mass murder against the IG Ludwigshafen, the more so because in all the camps and hospitals which I have seen I have never noticed nor received complaints in regard to collective bad treatment. In the contrary, when the conditions of the 3- to 4000 drafted men who were working in the plant were not always good, the management of the camps made at least an attempt to make them bearable by provisions for hygiene and by the organization of cultural, recreational and sport meetings. In this connection I want to honor the memory of M. Mions with whom I was often in contact and who has worked hard for the organization of the camps, as well as the untiring efforts of his secretary Fraulein Reichl who was of great assistance to us in the dark days of the bombing raids.

I conclude by expressing my hope that our American friends do not commit a terrible injustice by condemning both the guilty and the innocent alike. I knew that there existed in Germany some

- 4 -

terrible camps, but I cannot believe that the men who managed the
Ludwigshafen camps were guilty of the same crimes as committed
in Dachau or Mauthausen.

Would you kindly forward my best greetings to Doctor V. Nagel
and to my former colleagues Simon, Henig, and Braun, and tell
them that I would be glad to hear from them. In the hope to have
soon again a letter from you, I remain

very sincerely yours

signed: Jean Le Breton.

Ludwigshafen on the Rhine, 27 November 1947

signed: Dr. Walter Spormann

The above signature of Dr. Walter Spormann, affixed before me,
is herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 21 November 1947

signed: F. W. Wagner

Attorney.

Copy.

Document Book IV .. MURSTER
MURSTER Document No. 181
Exhibit No.

AFFIDAVIT.

I, the undersigned Heinrich SIMON, born 1 September 1895 in
Fuerth/Oderwald, residing in Ludwigshafen on the Rhine, Lonau-
strasse 2, have been duly warned that I shall render myself
liable to punishment by making a false affidavit. I declare
that my affidavit corresponds with the truth and that I have
been informed about the fact that it will be submitted as
evidence at the American Military Tribunal in the Palace of
Justice in Nuernberg for the case VI.

I am employed since 29 July 1912 in the Badische Anilin- & Soda-
Fabrik in Ludwigshafen on the Rhine, at first as a laboratory
worker, and later as a laboratory employee. During the war also
foreign workers were employed in my laboratory, among them also
Frenchmen. I worked myself together with a French foreign worker
by the name of Jean Le Breton. He did the same work as the German
workers. M. Le Breton was on very friendly terms with our German
co-workers. I frequently invited him also for dinner to my home.
Often when he was short of tobacco, I also helped him out with
this. On the other hand, when Le Breton received a package from
his homeland containing chocolate or similar things, he gave me
also something for my children. He treated him in exactly the
same manner as the German workers, and we became real friends.

Le Breton often expressed his satisfaction about the treatment, accommodations and provisioning.

Le Breton left our laboratory subsequently in order to work in the Comité d'entraide français for the interests of his comrades employed in the works. In this capacity he came to know very well the conditions of the foreign workers.

I have also read the letter dated of 23 May 1947 which Le Breton wrote to Dr. Spemann, and I am very glad that he has retained such pleasant memory of the time of our working together. I have also written to him again.

Ludwigshafen on the Rhine, 26 November 1947

signed: Simon Heinrich.

The above signature of Heinrich SIMON, affixed before me, Attorney Friedrich Wilhelm Wagner, Ludwigshafen on the Rhine, is herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 26 November 1947

signed: F. W. Wagner
Attorney.

Copy.

AFFIDAVIT.

I, the undersigned Ernst EICHERT, born 21 January 1898 in Ludwigshafen on the Rhine, residing in Ludwigshafen on the Rhine, Ritterstrasse 40, have been duly warned that I shall render myself liable to punishment by making a false affidavit. I declare that my affidavit corresponds with the truth and that I have been informed about the fact that it will be submitted as evidence at the American Tribunal in the Palace of Justice in Nuernberg for the Case VI.

I am employed since 1919 in the Badische Anilin- & Soda-Fabrik in Ludwigshafen on the Rhine-Opau, first as a technician and, since 1941, as a mechanical engineer.

During the war we employed in our department, the so-called factory machine shop Farben, also foreign workers. A foreign worker by the name of Bernard Renaudier was also working in my department. This foreign worker worked there as a designer. He was living in the foreign workers camp, in camp 2 and was employed in our factory for appr. two years altogether.

I was on very friendly terms with M. Renaudier and not only met him daily at our working place, but he also visited me in my home, although he was living in the foreign workers camp H. 2. There was nothing unusual in the fact that Renaudier visited me in my home, it was considered as quite normal, and people generally approved of it. I also brought now and then to the works

- 2 -

something to eat for Renaudier, and also wine and tobacco. It was therefore not at all surprising that Renaudier wrote to me after his return to France.

I am therefore in the possession of a letter from Paris of 13 May 1946 and another letter of 28 May 1946.

These letters are written in the German language. Renaudier knew indeed already some German when he came to Ludwigshafen and has greatly perfected his knowledge of writing and reading in German. It appears from the letters, particularly the letter of 13 May 1946, that he inquired in the most friendly manner about the other German employees of our factory with whom he worked together, and that he sends his "best regards" to them. Renaudier has always made it obvious that he was very satisfied with his treatment, accommodations and provisioning in the Ludwigshafen Works.

Ludwigshafen on the Rhine, 21 November 1947

signed: Ernst Eichert.

The above signature of Ernst Eichert, affixed before me, Attorney Friedrich Wilhelm Wagner, Ludwigshafen on the Rhine, is herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 21 November 1947

signed: F. W. Wagner
Attorney.

- 3 -

Certificate.

I herewith certify that the above photostatic copy is a true and original copy of Bernard Renaudier's letter of 13 May 1946, addressed to me.

Ludwigshafen on the Rhine, 21 November 1947

signed: Ernst Eichert.

The above signature of Ernst Eichert, affixed before me, Attorney Friedrich Wilhelm Wagner, Ludwigshafen on the Rhine, is herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 21 November 1947

signed: F. W. Wagner

Attorney.

- 4 -

Paris, 13 May 1946

Dear Mr. Eichert,

Forgive me and M. Quersoguet for not writing earlier, but until now we were not permitted to write and the mail restrictions have only been lifted several days ago. Everything has turned out all-right and we hope the same for you and your family.

You will probably be surprised that I am writing from Paris, I work here for the same firm as in my home town. Perhaps it will be once possible to travel again to Germany, then I shall certainly visit you. I would be very glad to chat with you once again. How is Fraulein ... Klus, Nebe, Herr Daumann, Stump, Nun and Dr. Ludwig? And how are the foreman we know, particularly Herr Russ?

I send my best regards to all of them. I hope you and your dear family are in good health and send you my best greetings.

Yours

Bernard Renaudier.

Monsieur Renaudier Bernard

aux et Nordou

1 av. de Verdun 1

PARIS, 10e

Copy.

AFFIDAVIT.

I, Architect (Regierungsbaumeister) Hermann Will, residing in Ludwigshafen on the Rhine, Hanserstr. 4a, have been duly warned that I shall render myself liable to punishment by making a false affidavit. I declare under oath that my affidavit corresponds with the truth and that it has been made in order to be submitted as evidence in the Military Tribunal at the Palace of Justice, Nuernberg, Germany.

I am Chief Engineer of the construction department Oppau of the Badische Anilin- & Soda-Fabrik. In December 1942, shortly after Christmas, a Belgian by the name of P. van Polfliet was among other foreign workers assigned to my department. He worked among other projects as a construction technician at the canalization for the concentration camps IV and V.

After the occupation he returned again to his country and has now, on his own impulse, written to several comrades, among others also to me. An informal correspondence resulted from this. The last letter which I received was dated 22 December 1946; I enclose with this affidavit a photostatic copy of that letter.

Ludwigshafen on the Rhine, 3 March 1948

signed: Hermann Will.

The above signature of Architect Hermann Will, Ludwigshafen on the Rhine, Hanserstr. 4a, affixed before Attorney Friedrich Wilhelm HARTER, is herewith certified and witnessed by me,
Ludwigshafen on the Rhine, 3 March 1948

signed: F. W. Hartner
Attorney.

Enclosure.

Herndon, 22 December 1946.

Dear Herr Hill,

Thank you for your kind letter of 6 December, and for giving my regards to the other friends. I was very glad to hear that all remember well their Belgian colleague. I even received a personal letter by Herr Doorman. Very kind of him.

I know very well, Herr Hill, how it looks in Germany and how matters stand. Therefore I understand so well your words "of course everybody would like to see that things start to improve slowly". It is, however, not hopeless, once conditions must improve, this is the only way to a generally sound economic situation.

I do not know whether it will be already possible, in any case I hope to come to Germany in the course of the year 1947.

Meanwhile, dear Herr Hill, I wish you all the best for Christmas and for the coming New Year.

Very sincerely yours
signed P. van Polfliet

116 Lindela
Herndon/Amstelveen
Belgium

CERTIFICATE OF TRANSLATION

31 March 1948

I, Helene LILJEMAND, DO B 398038, hereby certify that I am a duly appointed translator for the German and English languages and that the above is a true and correct translation of the original document.

Helene LILJEMAND
DO B 398 038.

Copy.

AFFIDAVIT.

I, the undersigned Adolf WEGMANN, born on 27 October 1892 at Birkenhoerd near Bergsabern, residing at Ludwigshafen/Rhine-Oggersheim, Affengraben No.65, have been duly warned that I render myself liable to punishment by making a false affidavit. I declare under oath that my statements correspond to the truth and I have been informed that they will be submitted as evidence for case 6 to the American Military Tribunal at the Palace of Justice, Nuernberg.

Since 22 February 1922 I have been employed at the Badische Anilin- & Soda-Fabrik, Ludwigshafen on the Rhine, at first as a worker, and since 1936 as assistant foreman. During the war there were also foreign workers (Fremdarbeiter), amongst them Frenchmen, employed in the department in which I worked. All the foreign workers employed with us were all well treated and were satisfactorily billeted and fed to judge by the remarks they made to me and my colleagues.

When I heard during the spring and summer of this year that accusations were being made against our plant to the effect that the foreign workers had not been decently treated, I wrote on my own initiative and without instructions, at that time even without the knowledge of the plant management, to a foreign worker who had been employed with us, a Frenchman called Edile Galpin at Montreuil, and informed him about this.

- 2 -

Thereupon M. Galpin wrote me a letter dated 29 June 1947 which shows quite clearly on what friendly terms we were and how well he was treated with us.

M. Galpin was employed at Ludwigshafen for about 38 months. I often invited M. Galpin to my flat. He gladly accepted these invitations and was a frequent guest at my house. Thus I remember very well that he spent at least two Xmas running with my family. As I lived a bit out of the way, he even made contact through me with French prisoners of war, and when he came back from his leave in France he brought one or the other a parcel from France.

The letter of 29 June 1947 which M. Galpin addressed to me reads as follows:

"My dear Adolf,

I was very surprised to get your letter and very pleased to hear that you are enjoying the best of health. I arrived home safely on Good Friday, 29 March 1945 and was happy to see all my family again, who send their kindest regards, also to Frau Marie and your two girls. I hope that your brother Emil and his wife are still quite well, as well as all my colleagues who worked with me, and "petite mustache", the old storekeeper. Best regards also to Doctor Hirschel.

Now, my dear old Adolf, let me give you the information you asked for. I worked with you at the I.G. Farben, Ludwigshafen, for 38 months. I never had any reason to complain about you.

- 3 -

I myself, as well as my French colleagues, and the Russian women who worked with us day and night, were always well treated. We had good lodgings; as regards the food, it was not plentiful but tasty, especially if one considers how many people were deported by Hitler in order to work for you. All Frenchmen and Russian men and women who were killed found their deaths in the bombing raids; for there was no SS-camp at Ludwigshafen, and none of the persons who worked at the I.G. were ever threatened by the German chiefs who supervised them.

signed: Edile Galpin
111, Rue de Paris
Montrouille/bois - Seine/France.

Dear Adolf, when you get my letter please write me what's going on at your place.

Edile.

My dear Adolf, best regards to you and Frau Marie Legrain and the two girls from us all. Keep well. Give my regards to all the people I know, as well as to "Turlare".

signed: Edile Galpin
111, rue de Paris
Montrouille s/bois - Seine/France.

It is true that the letter is written in French. But I had this letter translated at our plant. The French original I handed to Herr Wagner, Attorney-at-Law, Defense Counsel of Dr. BURSTER.

Ludwigshafen on the Rhine, 21 November 1947

signed: Adolf Wegmann.

- 4 -

The above *) signature of Adolf Wegmann was affixed before me, Friedrich Wilhelm Wagner, Attorney-at-Law, at Ludwigshafen on the Rhine, and its authenticity is confirmed and certified herewith.

Ludwigshafen on the Rhine, 21 November 1947.

signed: F. W. Wagner
Attorney-at-Law.

*) see previous page.

CERTIFICATE.

I herewith confirm that the photostatic copy on the previous page is a true and genuine photostatic copy of the letter which Edile Galpin addressed to me on 29 June 1947.

Ludwigshafen on the Rhine, 21 November 1947

signed: Adolf Wegmann.

The above signature of Adolf Wegmann was affixed before me, Friedrich Wilhelm Wagner, Attorney-at-Law, Ludwigshafen, and its authenticity is confirmed and certified herewith.

Ludwigshafen on the Rhine, 21 November 1947

signed: F. W. Wagner
Attorney-at-law.

Copy.

AFFIDAVIT.

I, the undersigned Dr. Walter Wesly, born on 27 February 1898 at Aachen, residing at Ludwigshafen on the Rhine, Priesenheimerstrasse 74, have been duly warned that I render myself liable to punishment by making a false affidavit. I declare that my statements correspond to the truth and have been informed that they will be submitted as evidence in case 6 to the American Military Tribunal at the Palace of Justice, Nuremberg.

Since 1 June 1925 I have been working as a chemist at the Badische Anilin- & Soda-Fabrik, Ludwigshafen on the Rhine. During the war we also employed foreign workers in our plant amongst them the foreign worker G. Terral, a Frenchman. I received a letter from him on 27 June 1946, without my having approached him in any way; this letter shows that he has pleasant memories of his work in my department. The following are his exact words:

"Do you think there would be any work for me in Germany, as I have decided to leave France, where I am not happy."

I have also complied with the request of M. Terral and written to the address he mentions.

Ludwigshafen on the Rhine, 21 November 1947

signed: Dr. Walter Wesly.

The above signature of Dr. Walter Wesly was affixed before me,, Friedrich Wilhelm Wagner, Ludwigshafen on the Rhine, and its authenticity is confirmed and certified herewith.
Ludwigshafen on the Rhine, 21 November 1947

signed: F. W. Wagner
Attorney-at-Law.

Copy.

Document Book IV. MUSTER
MUSTER Document No.193
Exhibit No.

Enclosure to Doc.No.193

Nice, 27 June 1946.

Dr. Neely
Box 257
I.G.Farbenindustrie
Ludwigshafen on the Rhine.

As according to a recent decision of the Allied Governments
postal communications with Germany are now permitted, it is a
pleasure for me to get in touch with you again.

I hope that both you and Edna Neely were spared in the last
bombing raids.

As to me, the advancing Americans found me at Hoofen near Kandel
on 23 March 1945, after I had escaped from the camp at Doornen-
bach, where I was very badly treated!!!!

Do you think that there would be any work for me in Germany, as
I have decided to leave France, where I am not happy.

Could you do me the favor of writing in German to Mr. Jung Wilhelm
at Hoofen near Kandel (Postmark) and asking him whether he still
has the suitcase I entrusted to him on 20 March 1945? That
suitcase has no value, but I attach great importance to the
souvenirs it contains.

Hoping that this will find you in good health, I am with best
regards .

Yours truly
signed: Terral.

G. Terral
14 Impasse St. Laurent
Nice.

Copy.

Document Book IV. FURSTER
FURSTER Document No. 267
Exhibit No.

AFFIDAVIT.

I, Oberingenieur Heinrich MUENZ, residing at Ludwigshafen on the Rhine, Kuttensmallerstr. 3, have been warned in the first instance that I render myself liable to punishment by making a false affidavit. I declare under oath that my statement corresponds to the truth and was made in order to be submitted as evidence to the Military Tribunal at the Palace of Justice, Nuremberg, Germany.

I state that the Belgian citizen, André van ECKHOUTTE, who was formerly employed in my department, i.e. the technical store of the Badische Anilin- & Soda-Fabrik, Ludwigshafen on the Rhine, and his wife, Hedwig van ECKHOUTTE, on their own initiative addressed a postcard as well as a letter to my department on 8 December 1947; in this letter they wish us a merry Xmas and a happy New Year, as well as sending greetings to their fellow-workers and exchanging memories. I attach photostatic copies of the above-mentioned postcard and letter to this statement.

Ludwigshafen on the Rhine, 4 March 1948

Signed: Heinrich Muenz.

Document Book IV .. MÜNSTER
MÜNSTER Document No. 267
Exhibit No.

The above signature of Heinrich MUENZ, Oberingenieur,
Ludwigshafen on the Rhine, Huettenmüllerstr. 3, was
affixed before Friedr. Wilh. Wagner, Ludwigshafen on
the Rhine, and its authenticity is confirmed and certified
herewith.

Ludwigshafen on the Rhine, 4 March 1948

signed: F. W. Wagner
Attorney-at-Law.

Enclosure.

Industriefabrik
Bau 296
Technical Store
Ludwigshafen on the Rhine.

A merry Xmas and a happy New Year to our dear
fellow-workers.

Signed: André

Hedwig

Van Zeehouutte

Enclosure.

Viehte, 8 December 1947.

To our dear fellow-workers.

It is more than two years since we left you. We went through the most terrible time with you, Xmas celebrations under a rain of bombs; thank goodness that is all over, but we have not forgotten it. Though I never got an answer last year I cannot desist from writing once more and asking: my dears, superiors and colleagues, how are you? I make no distinctions between my fellow-workers; I like all of them equally well. But one of them I want to greet specially: Heinz Johan, old man how are you; are you still in the workshop, my dear friend? How glad I am that I was assigned to you, I picked the right man, and I'll not forget the craftsmanship I learnt from you, for I practice frequently. You must excuse my bad writing, but my first finger got caught in a machine, I probably made enough mistakes. . . but I'm no country-man of yours, though your good friend!

Dear fellow-workers, now I'll let my wife go on writing - she hasn't forgotten you either.

Dear fellow-workers, I don't quite know what to write. It will be easier when we will have heard from you. I hear from my mother how things are over there. You will think: oh she has probably forgotten us long ago, but no. But I don't like writing, for things are better over here.

We are quite well so far. Our little boy is our greatest joy. Perhaps this letter will reach you. The of the woman is still at the "Ban"? Perhaps there is one among you who would like to write on a few lines. That's all for to-day.

Best regards to all of you from your
former fellow-worker Hedwig.

My very dear friends, my Hedwig hasn't got much to write:
"Make it short and sweet" is her motto.
Hoping that you are all well and perhaps will write to us
sometime, we send all of you our regards and wish you a
merry Xmas and a happy New Year.

André and Hedwig
Van Dackhoute
Duciné Voyestr. 2
Vichte 7. VL.
Belgium.

CERTIFICATE OF TRANSLATION

31 March 1948

I, Julia KERR, ETO 20 185, hereby certify that I am a duly appointed translator for the German and English languages and that the above is a true and correct translation of the original document.

Julia KERR
ETO 20 185.

C o p y

Affidavit.

The undersigned,

- a) Dr. Lothar JOENZ, chemist, Ludwigshafen on the Rhine,
Friesenheimerstr. 88,
b) Dr. Walter DANNI, chemist, Ludwigshafen on the Rhine,
Kekuleplatz 1,

have first been duly warned that they render themselves liable to punishment for making a false affidavit. They declare under oath that their statements correspond to the truth and that they were made in order to be submitted as evidence to the Military Tribunal at the Palace of Justice, Nuremberg, Germany.

a) I, the undersigned, Dr. Lothar JOENZ, received a letter from Tatiana KATONE of Lyons, dated 21 November 1945, a photostatic copy of which I attach to this copy. Tatiana KATONE formerly worked in the experimental plant of cokery D, Op 106, at Oppau, and attended the chemico-technical night school at Ludwigshafen through my good offices and by arrangement of the plant. The expenses incurred were paid by the plant.

b) I, the undersigned Dr. Walter DANNI, state that Tatiana KATONE, together with her mother Marie KATONE from Lyons, worked in my plant. Through myself and Dr. JOENZ, Tatiana KATONE was enabled, through the intermediary of the plant, to

attend the chemico-technical night school at Ludwigshafen; the expenses incurred were borne by the plant. I kept up a correspondence with Tatiana KACOME and her mother after they had returned to their home country, and, upon my request, they have sent me an officially certified statement, a photostatic copy of which I attach hereto.

I furthermore state that Dr. JOSEPH told me about his letter from Tatiana KACOME, dated 31 November 1946, which I have also read.

Ludwigshafen on the Rhine, 4 March 1948

signed: Dr. Walter DANIEL

signed: Dr. Lothar JOSEPH

The above signatures of

- a) Dr. Lothar JOSEPH, Ludwigshafen on the Rhine, Prietenheimerstr. 88,
 - b) Dr. Walter DANIEL, Ludwigshafen on the Rhine, Schulplatz 1,
- attested before Friedr. Wilh. WILHELM, attorney-at-law, Ludwigshafen,
are herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 4 March 1948

signed F. W. WILHELM

attorney-at-law

Annex

Lyons, 21 December 1946

Sir,

I have just written to Dr. WHITE and I answer you at the same time.

I have been surprised and hurt to learn that he has crumpled.

I remember him as a very kind man, who helped me in a very nice way, received me into his family and allowed me to pursue my chemistry studies. I have never learned anything detrimental about him and I have always seen him treat foreign workers in a correct way. I hope the matter is not serious and that everything will be all right. Anyway, let me know, please.

I remain,

Sir,

Your very truly

(signed) Tatiana K. GALT

13 rue Villebois-Mareuil

Lyons (3rd)

Annex

Stamp

I undersigned certify that Herr Daniel WITTE, my laboratory chief at the building Op 105 at the I. G. Farbenindustrie at Ludwigshafen on the Rhine, where I worked while in Germany, has always treated my mother and me (my mother also worked under him) in a very correct way. My fellow-workers never complained about him, quite to the contrary.

(signed) Tatiana KATCHE

and Eric K. GORE

Copy

Affidavit

I, the undersigned Dr. Bernhard THIE, born on 29 September 1909, living at Heidelberg, Am Rosenbusch 1, have first been warned that I render myself liable to punishment by making a false affidavit. I declare under oath that my statement corresponds to the truth, and that it was made in order to be submitted as evidence to the Military Tribunal at the Palace of Justice, Nuremberg, Germany, for case 6.

During the war, the Frenchman Georges D. THIE worked in the axonite laboratory. As a prisoner of war he was sent to work in the Badische Anilin & Soda Fabrik, Ludwigshafen on the Rhine, and later on, he was given the status of a civilian worker.

Without any request from me whatsoever, he sent me a handwritten letter from Nancy, dated 19 December 1943, which I quote verbatim as follows:

Nancy, 19 December 1943.

Sir,

I apologize for not having informed you sooner of my arrival home.

The journey was long and full of hardships, and I arrived in such a state of health that I had to go to hospital. The physicians have discovered a pulmonary disease (top of right lung affected). I must await the result of the radiographs before returning to my home. I feel better now, but I cannot yet leave hospital.

I had to wait for a very long time for my papers allowing me to return to France. I only left Ludwigshafen on 23 November for Forbach, whose Stalag XII F is situated. There, I learned that a convoy had just left for Trier, and that I had arrived four days late. I ought to have been at Forbach on 19 November. I had to wait for a few days at the prisoners camp. I had to wear uniform and no civilian clothes. During my return home, I reverted to P.O.W. status. I was at the Trier camp from 26 November until 8 December, and then I was sent to France (as a civilian camp Compiègne). The journey took two days and three nights. The German authorities set me free and handed me over to French officials.

I have not yet seen my home town and the Schveffel factory.

The papers made out by the I.C. were by no means necessary. I should only have rejoined my old labor detail, which would have sent me to Forbach, Stalag XII F. My departure was also hindered by red tape and by the ignorance of what to do in such cases.

Please accept once more, Sir, my best thanks for the consideration and confidence you have shown to me in the laboratories.

It is a great honor for me to have walked under you and I keep a happy memory from my stay at Ludwigshafen. I only regret that it had to occur under such sad circumstances. (A prisoner has no individual life any more).

Kindly accept, Sir, my best wishes for a happy Christmas and a prosperous New Year.

I hope to be able to see you again, and beg to remain.

Sir,

Yours very respectfully,

(signed) C. WOLFF

Laboratoire des traces sanguines
Mairie de Schwetzingen
Villages
(Mairie de Schwetzingen)

Ludwigshafen on the Rhine, 3 March 1948

signed: Dr. Bernhard THIE

The above signature of Dr. Bernhard THIE, appearing before me,
F. W. W. W., attorney-at-law, Ludwigshafen on Rhine, Schillerstr. 32,
is herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 3 March 1948

signed F. W. W.

attorney-at-law

Copy

Affidavit

I, the undersigned Dr. Wolf SIEGEL, born 23 July 1908, physician in the physical plant of the Fediache (Millin & Soer Fabrik, Ludwigshafen on the Rhine, living at Gounshain, Ludwigstr. 63, have been duly warned that I render myself liable to punishment by making a false affidavit. I declare under oath that my statement corresponds to the truth, and that it was made in order to be submitted as evidence to the Military Tribunal for case 6 at the Palace of Justice, Nuremberg/Germany.

During the war, the Frenchman Andre DUBOIS was employed in the physical plant as a foreign worker. Without any impediment I received a handwritten letter from him. The cancellation stamp on the envelope is dated 6 May 1946. I quote the contents in the original wording with all the errors in spelling:

At. Lou Is Forest, 6 May

Dear Dr. SIEGEL,

I am very glad to be able at least to write you a few words;

I have waited so long for this occasion.

I often think of you too; I hope that all of you are still well.

I would like to know what has become of the physical department.

I just read I saw Paul DUBOIS, and we talked much about Ludwigshafen, for we still

remember all of you very well. Paul is in a laboratory for
constructional work. I don't know anything about
Andre F. HELLER. I was a soldier since June last year and have
been discharged again. In the meantime I attend school again,
and I also work in an electro-technical testing laboratory.
I ask you, Doctor SISTIG, to give my best regards to Herr HELLER.
Finally, I hope that I shall have an opportunity to visit you.
With my best remembrances

signed: Andre LOUGES

Andre LOUGES
54 rue Pasteur
St. Louis Forest (S. t-O) France

At the end of 1946 I also received a New Year's card from the
before-mentioned Andre LOUGES with the following words:

"Best wishes for the New Year.

Kind remembrance

LOUGES

Ludwigshafen on the Rhine, 3 March 1948

signed: Dr. Wolf SISTIG

The above signature of Dr. Wolf SISTIG, appeared before me,
F. L. WIGER, attorney-at-law, Ludwigshafen on the Rhine, Schies-
hausstr. 32, is herewith certified and attested by me.
Ludwigshafen on the Rhine, 3 March 1948

signed F. L. WIGER

attorney-at-law

Copy

Affidavit

I, the undersigned Dr. Josef HOFFMANN, born 2 May 1904, physicist in the Physics department of the Deutsche Metall- und Eisenfabrik, Ludwigshafen on the Rhine, living at Ludwigshafen on the Rhine, Kochlerstr. 17a, have been duly warned that I render myself liable to punishment by making a false affidavit. I declare under oath that my statement corresponds to the truth and that it was made in order to be submitted as evidence to the Military Tribunal for case VI at the Palace of Justice, Munich, Germany.

During the war, the Prussian St. JMD IK worked in the physics division headed by me, without any involvement on my side, JMD IK sent me a handwritten letter, dated 15 November 1941 which I quote verbatim:

" Ludwigshafen, 15 November 1941.

To the Chief Engineer, Pyrotechnic Service, S.G.

I would like you to have your permission to go on leave from 6 to 16 December. I have no serious reasons for wanting to see my family. Thanks so much for having let me go last time and for having succeeded to enter my 3rd son to the Lyceum Concordat.

1. Paris, where he is studying.

2. My 6 months contract is expiring and, before renewing it,

I should like to have your opinion prior to asking a transfer.

I know since a long time that I could render better services but

I hardly understand German, this is even the main hindrance

for a correct discussion of my duties, as sometimes I misunderstand

orders; this morning, again, I confused the number of the workplace

with its length. I understood it was something to be repaired, but

it was a new workplace to be added. These small errors could be

corrected if the workplace numbers were written in a notebook,

as well as the numbers to be verified. This would avoid misunder-

standings, and moreover it would mean a work order authorizing the

presence of a foreign worker in a factory room.

I had started making a chart of the factory buildings in order

to be able to find them easily when sent to work there alone, but I

was given a hint that I could be accused of espionage, so that I

dropped the matter. I wrote these buildings in a notebook, which

I will destroy if you think it advisable. This would surprise me. May I take down in writing the essentials of pyrometric apparatus and installations which I would have to repair, keep in good order, change if necessary and even build? I admit that a workman like me finds it abnormal and uninteresting always to follow another workman like a dog devoted to his master and to work on what I am told to do. This does not flatter my professional pride. In France my work was always praised by engineers and constructors. I was more than 15 years in my last job, in 1931 I replaced the chief electrician there, I have supervised all new installations (some of them very important ones). I may mention a tri-phased electric stove of 250 kilowatts, with hand-driven or automatic electrodes, an electric stove for thermic application with a regulating pyrometer, I had 2 meters and a half per meter per stove; furthermore, and smelting installations, air heaters, thermic stoves for ore, steel and aluminum. It is true that these were very small pyrometric installations.

compare with your plant, which I believe is one of the most important on earth. I give you these details in order to show you that if I were to re-enter your section - you seek conscientious workers - I believe to be the right men in the right place. But if I gave a bad impression and if my capacity is under-estimated and before leaving your section, I would like to say that I am not scared by your big plant. It is true that you have apparatus unknown to me, thermostats, mercury disconnectors, but, while alive and having little time to study them, I nevertheless think that I shall be all right and think I shall be worthy of your trust. Sir, I do not want to leave your section without stating that your German workers since now have been very correct. My first fellow-worker was the excellent "X", a good worker with a good heart, rather excitable, but I understand how disagreeable it must be to be with someone you hardly understand. Besides that, my eyesight is bad, I had to stop driving on my first leave, then I returned, my comrade in self fell sick, and I admire your method for handling a convalescent. It is very nice and I regret that

many French industrialists do not apply such methods, my
superiors have at all times been very nice to me, very correct,
and very able when receiving slips. I had many German fellow-
workers, mainly Emil whom I like very much too, I shall
always remember them and I shall regret if no solution can be
found to enable me to work quietly in your section.
Kindly excuse my long-winded letter, I would have preferred
to write in your own tongue; I remain,

Sir,

yours very sincerely,

(signed) Dr. J. H. WUSTEN

Ludwigshafen on the Rhine, 3 March 1948

signed Dr. J. H. WUSTEN

The above signature of Dr. Josef H. WUSTEN, formerly before me,
P. A. 1671, att. may-at-law, Ludwigshafen on the Rhine,
Schlossstr. 12, is herewith certified and witnessed by me.
Ludwigshafen on the Rhine, 3 March 1948

signed P. A. 1671

Attorney-at-Law

Copy

Affidavit

I, the undersigned Dr. Josef H. HESTENBERG, born on 2 May 1904, Physicist at the physics division of the Badische Anilin & Soda Fabrik, Ludwigshafen on the Rhine, have been duly warned that I render myself liable to punishment by making a false affidavit. I declare under oath, that my statement corresponds to the truth, and that it was made in order to be submitted as evidence to the Military Tribunal for case VI at the Palace of Justice, Nuremberg/Germany.

During the war the Frenchman Maurice Jean DUFRENOY worked in the physics division which is under my direction. Without being induced by me Dufrenoy has sent me a handwritten letter dated 2 July 1942 which I herewith quote verbatim:

" Le Perroux, 2 July 1942.

Sir,

"I'm" excuse the liberty I take in writing you. I would like to tell you again that I am deeply grateful to you for the interest you have shown when I was working at the IG.

As I don't know one word of German, I should like you to convey to the Minister

of the electricians, to their supervisor, and to Herr RITZ, as
well as to the head of the laboratory, my best regards.

I hope for a lasting peace between our two countries, and
beg to remain,

Sir,

yours respectfully,

(signed) L. RITZ

THOMAS Maurice Jean

Electrician, Building 241

R. de Dieudonné

former assistant fitter
11 av. Jodun-Willin
16 Fawcett / Werra (Sonne)

Ludwigshafen on the Rhine, 3 March 1948

signed: Dr. Josef H. H. H. H.

The above signature, appeared before me, F. L. H. H.,

Attorney-at-Law, Ludwigshafen on the Rhine, Schierhauserstr. 32,

is herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 3 March 1948

signed F. L. H. H.

Attorney-at-Law

Copy

Affidavit

I, the undersigned Dr. Josef HENGSTBERG, born 2 May 1904, physicist in the physics Division of the Deutsche Metall- & Stahl-Fabrik, Ludwigshafen on the Rhine, living at Ludwigshafen on the Rhine, Wechlarstr. 17a, have been duly warned that I render myself liable to punishment by making a false affidavit. I declare under oath that my statement corresponds to the truth, and that was made in order to be submitted as evidence to the Military Tribunal for case VI at the Palace of Justice, Nuernberg/Germany. On 2 December 1947 I wrote a letter to the French worker Andre MOURGES who had been employed as a foreign worker in the physics division, of which I am the director, and asked him whether he would be willing to give an unbiased account of his residence during the time he worked at Ludwigshafen, and especially of the way he was treated by his fellow-workers and superiors in the camp and at the plant. I also asked him to allow me to use his statement as evidence. MOURGES then wrote me the following letter, dated 17 December 1947:

Andre MOURGES, 54 rue Testour St. Louis Port (S. et O)

Sir,

In answer to your letter of 2 December 1947, I can state the following:

During all the time I worked at building 241, I have never observed, from you or from the other Superiors, any bad treatments or punishments of my French or foreign fellow-workers. I can even state that at the critical time when our accommodation was destroyed owing to the continuous bombings of the plant and the camps, we have asked you to do something for us.

You have helped us by permitting about 26 aliens, working in your laboratories, to sleep in the basement of building 241. I cannot forget your intervention at the time my father died; while compassionate laws were partially suspended, you have nevertheless succeeded in getting me to France in a very short time.

Outside the Physikalischer-Betrieb, I have no personal knowledge of the facts mentioned in your letter.

I remain,

Sir,

Yours very sincerely,

(signed) L. DUROUX

St. Lou la Port , 17 December 1947.

Ludwigshafen on the Rhine, 3 March 1948.

signed: Dr. Josef HENNINGSEN.

Document Book IV A. TUSTEN
Document No. 231
Exhibit K.....

The above signature of Dr. Josef HENGST MASCH, appended before
me, F.V. TONER, attorney-at-law, Ludwigshafen on the Rhine,
Schlosshauserstr. 32, is herewith certified and witnessed by me,
Ludwigshafen on the Rhine 3 March 1948

signed: F.V. TONER

Attorney-at-Law

Copy

Affidavit

I, Dr. Fritz MULLER, living at Ludwigshafen on the Rhine,
Wehlerstr. 6, have first been warned that I render myself liable
to punishment by making a false affidavit. I declare under oath
that my statement corresponds to the truth, and that it was made
in order to be submitted as evidence to the Military Tribunal
at the Palace of Justice, Nuernberg/Germany.

I affirm that during the war a French national by the name of
Maurice BLAND was employed in the plant fire brigade under my
command. Monsieur BLAND, by his own free will, wrote a letter to
the main fire department, a photostatic copy of which letter I
attach to this statement.

Ludwigshafen on the Rhine, 3 March 1948

signed: Dr. Fritz MULLER

The above signature of Dr. Fritz MULLER, Ludwigshafen on the Rhine,
Wehlerstr. 6, appeared before me, Friedr. Will. MEYER, attorney-
at-law, is herewith certified and witnessed by me.

Ludwigshafen on the Rhine, 3 March 1948

signed: F. W. MEYER

Att. may-at-law

Monsieur Maurice BLOND
6 rue Pasteur Font-s-Musson

I send my kin' fellow-workers my best wishes for a
prosperous 1947. August 1947 will soon receive a letter.
Kind regards to my friends, a warm family.

(signed) MING

Hauptkassensch. I.G.

(22) Luwisshofen to chain

Germany Friesenhausen Str. 123
March 1947

Document Book IV A WILSON
Document No. 269
Exhibit No....

CERTIFICATE OF TRANSLATION

31 March 1948

I, Leon Sidersdorfer STU 483, hereby certify
that I am a duly appointed translator for the
German and English languages and that the above
is a true and correct translation of Document
Book IV A WILSON.

Leon Sidersdorfer

STU 483.

Defense
Case 6

Tribunal VI

Case 6

Supplement

to

Document Book 6 for Dr. Carl Wurster

Presented by the defense counsel as:

Attorney at Law
Friedrich Wilhelm Wagner

Attorney at Law
Dr. Wolfgang Heintzeler

Handwritten signature



AFFIDAVIT.

State of New York /s.s.
County of Westchester

TO WHOM IT MAY CONCERN:

I, Max Mayer, an American citizen, residing at 4 Withington Rd. Scarsdale, New York, depose and say

1/ The United Chemical and Metallurgical Works Usti-Praha, Czechoslovakia, made an agreement in 1927 or 1928 with the "Metallgesellschaft" at Frankfurt/Main and with "Lurgi-Chemie G.m.b.H. fuer Chemie und Huettenwesen Frankfurt a/Main, a subsidiary of the Metallgesellschaft/, referring to the joint exploitation of the knowledge and experience of both firms in the field of the manufacture of sulphuric acid using the contact process. The object of the agreement was to sell sulphuric acid plants in all countries of the world.

2/ I.G.Farben Industry joined the two firms mentioned above as the third partner in 1934. In consequence of this agreement the first meeting of the technical representatives of I.G.F., Metallgesellschaft and the Aussig-Praha Company took place at Aussig in September 1934, in order to exchange the technical experience between I.G.F., Lurgi and the Aussig-Praha Company. Similar technical conferences took place later on from time to time. The agreement between the three firms gave very satisfactory results and was of considerable advantage to the licensees in the various countries. It was always a great pleasure to discuss the technical problems with Dr. Wurster and I was very much impressed by his technical ability. Dr. Wurster visited me several times in my home; this gave me the opportunity to know him also from the human side.

Dr. Wurster had a very liberal mind and was extremely versatile; I never observed any prejudice and in my opinion he was opposed

to nationalistic tendencies. This impression came from several conversations in general lines. He knew that I and Mr. Schmidt-Fellner, the representative of the Lurgi group, were non arians, but his behaviour and utterances showed clearly that he did not relish the racial theories of Hitler.

When I left Czechoslovakia I told my successor, Dr. A. Basch, that further cooperation with Dr. Wurster and his associates would be of real advantage to the Lussig-Praha Company.

signed: Max Mayer

Subscribed and sworn to before me

this 20 day of March 1948.

signed: HARRY S. SHILLER

NOTARY PUBLIC in the State of New York
Appointed for Westchester County
Commission Expires March 30, 1948

Die wortgetreue und richtige Abschrift des obigen Schrift-
stueckes wird hiermit bescheinigt.

Friedrich Wilhelm WAGNER

Rechtsanwalt

Heust

Disposition of Doc. Books WUSTER

Tribunal 6
Case VI

Disposition

of the Document Books for Dr. Carl WUSTER

Contents	Volume	Page
<u>Curriculum Vitae of Dr. WUSTER</u>	I	1 - 94
<u>Count I: Prosecution for a war of aggression</u>		
Prosecutions for rehabilitation at Ludwigshafen-Cann	II	1 - 16
The sphere of Dr. WUSTER's technical work, especially sulphuric acid	II	17 - 29
In particular: Documents to elucidate Prosecution-Exhibit 1947	II	30 - 40
Documents concerning sulphuric acid from calcium sulphate	II	46 - 54
Storage of pyrite (books with the letter of the Reich War Ministry to Ludwigshafen, dated 21 December 1937, contained in Prosecution-Exhibit, No. 749, Doc. No. NI-8843, Volume 47)	II	55 - 65
Parties of technical cooperation with foreign countries from 1939	II	66 - 67
Documents concerning Dr. WUSTER's work in the line of sulphuric acid outside of the I.G.	II	68 - 76
Document dealing with Prosecution-Document NI-5773, Exh. 1020, Volume 50	II	77 - 78
<u>Count II: Spoliation and Looting</u>	II	79 - 90

Gang



Page 1 of original c nt.

Contents	volum	page
<u>Count III</u>		
1.) Document concerning the general characterization of the employment of foreign workers at Ludwigshafen-Opau	III	1 - 40
2.) Documents concerning Dr. WUSTER's attitude toward social questions, especially in regard to foreign workers	III	41 - 66
3.) Treatment of foreign workers at Ludwigshafen-Opau		
Accommodation	III	67 - 85
Food	III	86 - 125
Clothing	III	126 - 140
Pay	III	141 - 153
Medical care	IV	1 - 33
Religious welfare	IV	34 - 36
Measures to improve linguistic understanding between foreigners and Germans.	IV	37 - 40

Disposition to Doc. Books MUSTER

Page 2 of original

Dispositionto the Document Book for Dr. G. MUSTER

Contents	Volume	Page
Leisure-time arrangements for foreign workers	IV	41 - 52 b
Documents dealing with Prosecution-Document VI-5915, Bph. 1342, Volume 69	IV	53 - 64
Letter protection for foreign workers	IV	65 - 76
Documents concerning Prosecution-Document VI-6315, Bph. 1339, Volume 69	IV	77 - 85
Welfare work concerning Eastern-workers in particular	IV	86 - 134
Comments made by foreign workers on the treatment they met with at the I.G. Plant at Ludwigshafen	IV	1 - 24
Affidavits of persons who have received letters of appreciation written by foreign workers, formerly employed at the Ludwigshafen Plant.	IV	25 - 71
4.) <u>Employment of Prisoners of War</u>	V	1 - 73
5.) <u>Supplementary Documents concerning the "Godesch question" dealing with the relations of the Ludwigshafen Plant and Dr. MUSTER to Godesch.</u>	VI	1 - 23
<u>Dr. MUSTER's Character</u>		
Dr. MUSTER's character as judged by representatives of the protestant and catholic churches.	VI	24 - 39
Examples of support given by Dr. MUSTER to racial persecutees	VI	40 - 47
Additional affidavits sent by people who were aided by Dr. MUSTER when they were persecuted on account of their race.	VI	48 - 75
Other documents concerning Dr. MUSTER's character, etc., in particular, his attitude toward the NSDAP and the war	VI	76 - 112

Disposition to Doc. Backs WURSTEN

CERTIFICATE OF TRANSLATION

1 April 1948

I, Leon Osterederer ATO 483, hereby
certify that I am a duly appointed trans-
lator for the German and English languages
and that the above is a true and correct
translation of Document DISPOSITION TO
"DOCS WURSTEN".

Leon Osterederer

ATO 483.

MICROCOPY

892

ROLL

94

